

VISR Itinerary

SUNDAY – 31 JULY

Evening: Check-in at Residence Inn New Orleans Elmwood (1080 Elmwood Park Boulevard, New Orleans, Louisiana 70123)

MONDAY – 1 AUGUST

Morning: Entry at **Enterprise Gas Processing – Norco Fractionation Plant [1]**

Afternoon: Entry at **BASF Corp – Geismar Site [2]**

Evening: Residence Inn New Orleans Elmwood (overnight)

TUESDAY – 2 AUGUST

Morning: Entry at **Americas Styrenics LLC – St. James Plant [3]**

Afternoon: Entry at **DuPont de Nemours – Pontchartrain Works [4]**

Evening: Residence Inn New Orleans Elmwood (overnight)

WEDNESDAY – 3 AUGUST

Morning: Check-out at Residence Inn New Orleans Elmwood
Entry at **Enterprise Products Operating – Baton Rouge Fractionators/PCU [5]**
Entry at **Placid Refining – Port Allen Refinery [6]**

Afternoon: Entry at **Kinetica Partners – Separation and Dehydration Station 508 [7]**

Evening: Check-in at SpringHill Suites Lake Charles (1551 West Prien Lake Road, Lake Charles, Louisiana, 70601)

THURSDAY – 4 AUGUST

Morning: Entry at **Indorama Ventures Olefins – Lake Charles Facility [8]**

Afternoon: Entry at **Sasol Chemicals – Lake Charles Chemical Complex [9]**

Evening: SpringHill Suites Lake Charles (overnight)

FRIDAY – 5 AUGUST

Morning; Check-out at SpringHill Suites Lake Charles
Entry at **Equistar Chemicals [10]**

Afternoon: Return home

Message

From: Rosenthal, Benjamin [Rosenthal.Benjamin@epa.gov]
Sent: 5/18/2022 6:30:20 PM
To: Leathers, James [Leathers.James@epa.gov]; Donaldson, Benjamin [Donaldson.Benjamin@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]
Subject: PAT project-Sasol Report
Attachments: Sasol_appendix_1_video_log.pdf; InspRptAirSasolChemicalsLLCLakeCharlesChemicalComplex20220412.docx

Hi James and Ben,

As discussed, please see the inspection report and appendices for Sasol Lake Charles Chemical Complex attached. I will concurrently enter these documents into erouting.

Let me know if you have any questions.

Ben Rosenthal

Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-6453

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Appendix 1

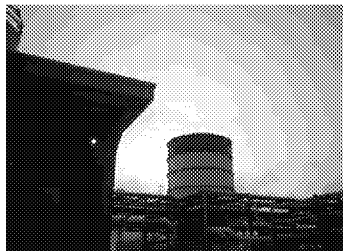
Video Log



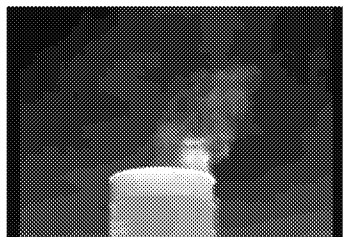
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Sasol Chemicals LLC / Lake Charles Chemical Complex		
City: Westlake	Calcasieu	State: Louisiana



Video File Name: MOV_0044.mp4
Date of Video: 04/12/2021
Time of Video:
Videographer: James Haynes
Description: OGIC visualized emissions from the enclosed ground flare at the Comon unit. *



Video File Name: MOV_0046.mp4
Date of Video: 4/12/2022
Time of Video:
Videographer: Ben Rosenthal
Description: OGIC visualized emissions from the enclosed ground flare at the Comon unit. *

*All videos can be made available for viewing upon request.

Message

From: Donaldson, Benjamin [Donaldson.Benjamin@epa.gov]
Sent: 5/24/2022 3:20:58 PM
To: Rosenthal, Benjamin [Rosenthal.Benjamin@epa.gov]; Leathers, James [Leathers.James@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]
Subject: RE: PAT project-Sasol Report
Attachments: InspRptAirSasolChemicalsLLCLakeCharlesChemicalComplex20220412 Donaldson comments.docx; Sasol Inspection peer review Complete.pdf

I added the following two comments:

1. I wasn't sure if the highlighted portion was meant to be highlighted in the submitted version.
2. The inspection report template says to list the facility's hours of operation.

From: Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>
Sent: Wednesday, May 18, 2022 1:30 PM
To: Leathers, James <Leathers.James@epa.gov>; Donaldson, Benjamin <Donaldson.Benjamin@epa.gov>
Cc: Haynes, James <haynes.james@epa.gov>
Subject: PAT project-Sasol Report

Hi James and Ben,

As discussed, please see the inspection report and appendices for Sasol Lake Charles Chemical Complex attached. I will concurrently enter these documents into erouting.

Let me know if you have any questions.

Ben Rosenthal

Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-6453

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Note: Must open in
Adobe before use.

Enforcement & Compliance Assurance Division
INSPECTION REPORT PEER REVIEW FORM

Inspection Date(s):	4/12/2022
Media:	Air
Company Name:	Sasol Chemicals LLC
Facility Name:	Lake Charles Chemical Complex

Lead Inspector:	Ben Rosenthal
-----------------	---------------

Administrative Reviewer:	Ben Donaldson
Technical Reviewer:	Ben Donaldson

I. Administrative Review:

ITEM	Y	N	N/A	COMMENTS
1. Lead Inspector provided applicable materials for report review.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Latest Inspection Report template used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3. Report followed the template guidelines.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. References within the report to Figures, Tables, Appendices, and Areas of Concern are accurate.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Grammar and spelling had been checked prior to Peer Review.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Administrative Review - Signature Section

Additional
comments:

- ☐ Reviewed, no comments.
- ☒ Reviewed with comments, re-submittal not requested.
- ☐ Returned, comments should be addressed, re-submittal requested to verify corrections.
- ☐ Comments were not fully addressed.
- ☐ Comments were adequately addressed.

Administrative
Reviewer:

**BENJAMIN
DONALDSON**

Signature and Date

Digitally signed by BENJAMIN
DONALDSON
Date: 2022.05.24 10:00:12 -05'00'

II. Technical Review:

Lead Inspector will provide the Draft Report with appendices (via e-Routing) to the Technical Reviewer. The lead inspector will also supply (external to e-Routing) the following project records, as applicable: QAPP, field logbook(s), field checklist(s), Chain of Custody record, Receipt for Samples form, analytical results, photographs, and other associated materials (e.g., raw data, spreadsheets, references).

ITEM	Y	N	n/a	COMMENTS
Field logbook(s) and/or checklist(s):				<i>Note the approximate percentage (10% or more) of information verified for each of items 1-3 below.</i>
6. Photographic log information accurately transcribed to the report.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. GPS information accurately transcribed to the report.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Calculations accurately transcribed to the report.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Draft Report:				
9. Report contained figures, maps, diagrams and/or photographs to support the Areas of Concern.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Calculations, data reductions, spreadsheet results, etc. were correct and sufficiently described to allow reproducibility by another qualified individual.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
11. The report referenced Standard Operating Procedures used during the inspection.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. The inspector recorded deviations from, additions to, and/or exclusions from the 6EN Operating Procedures in the logbook and identified and discussed them in the report.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. The report referenced regulatory limits, action levels, regulatory citations, and/or other applicable criteria and the references were correct.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. The report narrative noted exceedances to the regulatory limits, action levels and/or other applicable criteria and documented these as AOCs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. Overall information presented was factual and pertinent to the investigation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. The AOCs were logically derived and valid based on the data presented in the report.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ITEM	Y	N	N/A	COMMENTS
SAMPLING/FIELD MEASUREMENT REVIEW:			<input checked="" type="checkbox"/>	If N/A checked, no sampling or field measurements were performed. Skip to the Signature Section.
Report content:				
17. Report contained information on specific environmental conditions that may have affected a field measurement and/or sample.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18. Report contained a statement on the estimated uncertainty of field measurements .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19. Report contained results/discussion of field quality control samples .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20. Report identified organization(s) and activity conducted by the organization(s) (e.g., field sampling, field measurement activities, and/or laboratory analyses).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21. Report identified laboratory analytical method(s) used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22. Report contained all field measurements and/or analytical results, including units of measurement , to support the Areas of Concern.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Calibration and Field Measurements:			<i>Note the approximate percentage (10% or more) of information verified for each of items 19-22.</i>	
23. Calibration standards/buffers were within their expiration date.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24. Inspectors performed equipment calibrations .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25. Field measurements (e.g., pH, turbidity, conductivity) in the report were accurately transcribed (including correct units of measurement).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Chain of Custody and Receipt for Samples Records:				
26. Sample information (e.g., station/sample IDs, dates, times, locations, and descriptions) in the report was accurately transcribed from the Chain of Custody and the Receipt for Samples Form.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Analytical Results:				
27. Laboratory analytical results in the report were accurately transcribed (including correct units of measurement).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Technical Reviewer Signature Section	
Additional comments:	
<input checked="" type="checkbox"/> Reviewed, no comments. <input type="checkbox"/> Reviewed with comments, re-submittal not requested. <input type="checkbox"/> Returned, comments should be addressed, re-submittal requested to verify corrections. <input type="checkbox"/> Comments were not fully addressed <input type="checkbox"/> Comments were adequately addressed.	
Technical Reviewer:	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">BENJAMIN DONALDSON</h1> </div> <div style="text-align: right;"> <p>Digitally signed by BENJAMIN DONALDSON Date: 2022.05.24 10:15:48 -05'00'</p> </div> </div> <div style="text-align: center; margin-top: 5px;">Signature and Date</div>

Supervisor Signature Section	
Additional comments:	
<input type="checkbox"/> Reviewed, no comments. <input type="checkbox"/> Reviewed with comments, re-submittal not requested. <input type="checkbox"/> Returned, comments should be addressed, re-submittal requested to verify corrections. <input type="checkbox"/> Comments were not fully addressed <input type="checkbox"/> Comments were adequately addressed.	
Supervisor (of the Inspector):	<div style="text-align: center; margin-top: 5px;">Signature and Date</div>

Message

From: Evynn M. Overton [EOverton@bdlaw.com]
Sent: 7/27/2022 4:47:43 PM
To: Rosenthal, Benjamin [Rosenthal.Benjamin@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Rosnell, Christian [Rosnell.Christian@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Potgieter, Pieter (PP) [Pieter.Potgieter@us.sasol.com]; Mary.Idlett@us.sasol.com; Megan L. Morgan [MMorgan@bdlaw.com]
Subject: Response to Request for Substantiation from an Affected Business – Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex – Agency Interest No. 3271 – Westlake, Calcasieu Parish, Louisiana
Attachments: 2022-07-27 Sasol Response to EPA Region 6 re CBI Substantiation - CONFIDENTIAL.pdf

**CONFIDENTIAL BUSINESS INFORMATION
NOT SUBJECT TO FOIA DISCLOSURE**

Good morning, Mr. Rosenthal –

Attached please find the Response to Request for Substantiation from an Affected Business – Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex – Agency Interest No. 3271 – Westlake, Calcasieu Parish, Louisiana, which itself is confidential business information and not subject to FOIA disclosure.

Please let me know if you have any questions or comments.

Best regards,
Evynn

Evynn M. Overton
Principal



201 North Charles Street, Suite 2210 ~ Baltimore, MD 21201 ~ bdlaw.com
O +1.410.230.1335 ~ M +1.410.961.0527 ~ EOverton@bdlaw.com

CONFIDENTIALITY STATEMENT: This electronic message contains information from the law firm of Beveridge & Diamond, P.C. and may be confidential or privileged. The information is intended solely for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please notify us immediately by telephone at +1.202.769.6000 or by e-mail reply and delete this message. Thank you.

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 4/5/2022 7:58:50 PM
To: Haynes, James [haynes.james@epa.gov]
Subject: Re: Can you please review and sign? let me know if you have questions.
Attachments: HASP for GMAP_PAT project.pdf

Thanks

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

From: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
Sent: 7/25/2022 6:56:12 PM
To: Leathers, James [Leathers.James@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]
Subject: RE: VISR HASP
Attachments: HASP for VISR_jh_cm.pdf

Signed. James L, please see attached for signature.

-Colleen

From: Haynes, James <haynes.james@epa.gov>
Sent: Monday, July 25, 2022 13:04
To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>
Subject: RE: VISR HASP

Signed.

Colleen, once you have signed – please send to Leathers for his signature. Also, a quick note on my fit test: I passed my fit test last Thursday, but I haven't heard back from Mike Nelson. Hopefully he updated everything for Kendra.

Thanks,
James

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, July 25, 2022 9:50 AM
To: Haynes, James <haynes.james@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>
Subject: VISR HASP

Good Morning,

Attached is the HASP for the VISR trip. Please review and let me know if there are any updates to be made.

Thanks,

Colleen McCarthy
Air Toxics Enforcement Section
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270
P: 214-665-7334
mccarthy.colleen01@epa.gov
(she/her/hers)

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Message

From: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
Sent: 7/25/2022 2:49:40 PM
To: Haynes, James [haynes.james@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]
Subject: VISR HASP
Attachments: HASP for VISR.pdf

Good Morning,

Attached is the HASP for the VISR trip. Please review and let me know if there are any updates to be made.

Thanks,

Colleen McCarthy
Air Toxics Enforcement Section
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270
P: 214-665-7334
mccarthy.colleen01@epa.gov
(she/her/hers)

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 7/26/2022 2:54:04 AM
To: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]
Subject: RE: VISR HASP
Attachments: HASP for VISR_jh_cm_JL.pdf

Hey Colleen,

Good job on the HASP. I signed page 2 of the HASP and also the Covid supplemental JHA.

I hate to bring this up, but before we submit to Kendra, you might want to digitally sign the JHA, next to your name (page 11 of 35). Kendra has a few key items she reviews, and I think your signature next to the JHA might be one of them. I didn't check the lock doc box after my electronic signature, but if you have any trouble, I will be able to do a quick re-sign tomorrow.

Finally, let me know if you want me to send to Kendra or if you plan to. If you prefer to send, please just add me as a cc.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, July 25, 2022 1:56 PM
To: Leathers, James <Leathers.James@epa.gov>
Cc: Haynes, James <haynes.james@epa.gov>
Subject: RE: VISR HASP

Signed. James L, please see attached for signature.

-Colleen

From: Haynes, James <haynes.james@epa.gov>
Sent: Monday, July 25, 2022 13:04
To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>
Subject: RE: VISR HASP

Signed.

Colleen, once you have signed – please send to Leathers for his signature. Also, a quick note on my fit test: I passed my fit test last Thursday, but I haven't heard back from Mike Nelson. Hopefully he updated everything for Kendra.

Thanks,
James

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, July 25, 2022 9:50 AM
To: Haynes, James <haynes.james@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>
Subject: VISR HASP

Good Morning,

Attached is the HASP for the VISR trip. Please review and let me know if there are any updates to be made.

Thanks,

Colleen McCarthy
Air Toxics Enforcement Section
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270
P: 214-665-7334
mccarthy.colleen01@epa.gov
(she/her/hers)

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Message

From: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
Sent: 7/26/2022 12:07:44 PM
To: Leathers, James [Leathers.James@epa.gov]
CC: Haynes, James [haynes.james@epa.gov]
Subject: RE: VISR HASP
Attachments: HASP for VISR_jh_cm_JL.pdf

Thanks, James. The JHA is actually digitally signed but when you download it from the SEMP sharepoint, it disappears for some reason. I've resigned it so this version has my signature saved.

If you could send to Kendra, that would be great.

From: Leathers, James <Leathers.James@epa.gov>
Sent: Monday, July 25, 2022 21:54
To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Cc: Haynes, James <haynes.james@epa.gov>
Subject: RE: VISR HASP

Hey Colleen,

Good job on the HASP. I signed page 2 of the HASP and also the Covid supplemental JHA.

I hate to bring this up, but before we submit to Kendra, you might want to digitally sign the JHA, next to your name (page 11 of 35). Kendra has a few key items she reviews, and I think your signature next to the JHA might be one of them. I didn't check the lock doc box after my electronic signature, but if you have any trouble, I will be able to do a quick re-sign tomorrow.

Finally, let me know if you want me to send to Kendra or if you plan to. If you prefer to send, please just add me as a cc.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, July 25, 2022 1:56 PM
To: Leathers, James <Leathers.James@epa.gov>

Cc: Haynes, James <haynes.james@epa.gov>

Subject: RE: VISR HASP

Signed. James L, please see attached for signature.

-Colleen

From: Haynes, James <haynes.james@epa.gov>

Sent: Monday, July 25, 2022 13:04

To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>

Cc: Leathers, James <Leathers.James@epa.gov>

Subject: RE: VISR HASP

Signed.

Colleen, once you have signed – please send to Leathers for his signature. Also, a quick note on my fit test: I passed my fit test last Thursday, but I haven't heard back from Mike Nelson. Hopefully he updated everything for Kendra.

Thanks,
James

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>

Sent: Monday, July 25, 2022 9:50 AM

To: Haynes, James <haynes.james@epa.gov>

Cc: Leathers, James <Leathers.James@epa.gov>

Subject: VISR HASP

Good Morning,

Attached is the HASP for the VISR trip. Please review and let me know if there are any updates to be made.

Thanks,

Colleen McCarthy
Air Toxics Enforcement Section
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270
P: 214-665-7334
mccarthy.colleen01@epa.gov
(she/her/hers)

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 7/27/2022 4:13:46 PM
To: Haynes, James [haynes.james@epa.gov]; McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
Subject: FW: Re: HASP review for upcoming Louisiana Inspections
Attachments: HASP for VISR_jh_cm_JL.pdf

FYI,

Follow up email sent to Kendra's out of office. On a different note, I did approve your TA Colleen, to keep it moving.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Leathers, James
Sent: Wednesday, July 27, 2022 11:13 AM
To: Nelson, Michael <Nelson.Michael@epa.gov>; Smalls, Eric <Smalls.Eric@epa.gov>
Cc: Mask, Kendra <Mask.Kendra@epa.gov>
Subject: FW: Re: HASP review for upcoming Louisiana Inspections

Hi Mike and Eric,

We are in another time crunch for an upcoming inspection with travel planned to start on 7/31. Is there someone that can review and authorize the attached HASP as acting for Kendra, or is it better to wait for Kendra to get back tomorrow. I worry that she might come back to a mass of other priorities and we can't get our HASP approved in time. Let me know if you have any suggestions to expedite our HASP approval.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Leathers, James

Sent: Tuesday, July 26, 2022 7:16 AM

To: Mask, Kendra <Mask.Kendra@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Haynes, James <haynes.james@epa.gov>

Subject: Re: HASP review for upcoming Louisiana Inspections

Good Morning Kendra,

Attached is a HASP for some upcoming inspections in Louisiana. The inspections will be Flare focused, primarily surveying the flare from a distance, and potentially making entry when the FLIR or VISR observe potential excess emissions. Please let me or the Team know if you have any questions or need anything additional. Thanks

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

From: Jon Morris [JonMorris@providencephotonics.com]
Sent: 8/9/2022 3:09:43 PM
To: Haynes, James [haynes.james@epa.gov]
Subject: RE: Region 6 Flare Inspections w/ VISR

Hi James,

We did make it back safely, I trust you your travel was uneventful though you must have gotten back pretty late.

Thanks for the information on EMAX, we will follow up with Indorama and see if they are really willing to do an AMP. I was glad to see the composition of their flare included 30% methane. I was puzzled by what we were seeing in the field when they told us that it was 96% hydrogen. Once they provided the composition, the field data made sense. I do think their flare was over-steamed though.

Thanks,
Jon

From: Haynes, James <haynes.james@epa.gov>
Sent: Monday, August 8, 2022 2:00 PM
To: Jon Morris <JonMorris@providencephotonics.com>
Subject: FW: Region 6 Flare Inspections w/ VISR

[EXTERNAL EMAIL]

Hey Jon. I hope y'all made it back home safely.

Here is an FYI on the EMAX from Jason:

From: Dewees, Jason <Dewees.Jason@epa.gov>
Sent: Monday, August 8, 2022 1:20 PM
To: Haynes, James <haynes.james@epa.gov>; Buening, Hans <Buening.Hans@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>
Cc: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Region 6 Flare Inspections w/ VISR

James,

Wow, that looks like its going to be a great data set. I would extremely interested in looking at whatever doesn't get locked up in enforcement work.

As for the EMAX, we did add at hook for the VISR.

(xiv) In lieu of meeting the requirements in §§ 63.670 and 63.671 of subpart CC, an owner or operator may submit a request to the Administrator for approval of an alternative test method in accordance with § 63.7(f). The alternative test method must be able to demonstrate on an ongoing basis at least once every 15-minutes that the flare meets 96.5% combustion efficiency and provide a description of the alternative recordkeeping and reporting that would be associated with the alternative test method. The alternative test method request may also include a request to use the alternative test method in lieu of the pilot or flare flame monitoring requirements of 63.670(g).

Jason

From: Haynes, James <haynes.james@epa.gov>

Sent: Monday, August 8, 2022 11:10 AM

To: Dewees, Jason <Dewees.Jason@epa.gov>; Buenning, Hans <Buenning.Hans@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>

Cc: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>

Subject: Region 6 Flare Inspections w/ VISR

Good morning,

I just wanted to send out a note following our inspections last week in Louisiana. We took three instruments out with us last week: **(1)** the Mantis (cooled; looks at 9 spectral bands); **(2)** the Mantis Lite (uncooled; looks at 4 spectral bands); and **(3)** the FLIR GF320 (cooled OGI camera).

I need to go back and review my notes, but we went to 11 different sites and recorded data for about 25 to 30 flares. There was a good mixture of unassisted, air-assisted, and steam-assisted flares. Here is a table showing the breakdown of where we visited:

FACILITY/OWNER	CITY
Enterprise Gas Processing LLC - Norco Fractionation Plant	Norco
BASF Corp - Geismar Site	Geismar
Americas Styrenics LLC - St James Plant	St. James
E I DuPont de Nemours & Co Inc - Pontchartrain Works	Laplace
Baton Rouge Act Frac/PCU	Port Allen
Placid Refining Co LLC - Port Allen Refinery	Port Allen
Sasol North America Inc - Lake Charles Chemical Complex	Westlake
Louisiana Integrated Polyethylene JV LLC	Westlake
Phillips 66 Co - Lake Charles Refinery	Westlake
Kinetica Partners LLC - Separation & Dehydration Station 508	Kaplan
Indorama Ventures Olefins LLC - Lake Charles Facility	Westlake

Once we get the data back, I will be sure to share that info with those interested. As an FYI – the last site we visited (Indorama) was very interested in submitting an AMP to use the VISR technology in lieu of the EMACT flare requirements. I told them OAQPS would likely have a final say on the approval, but they may still submit it to R6. If that happens, I will be reaching out.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Burke, Shaun [Burke.Shaun@epa.gov]
Sent: 9/14/2022 1:37:58 PM
To: Jason Sese [Jason.Sese@erg.com]
CC: Jon Morris [JonMorris@providencephotonics.com]; Yousheng Zeng, Ph.D., PE [YoushengZeng@providencephotonics.com]; Haynes, James [haynes.james@epa.gov]
Subject: FW: Region 6 VISR Reports
Attachments: RE: Region 6 - VISR Reports

Hi Jason, Region 6 was looking for the VISR project reports from Providence. Just wanted to make sure I didn't miss those. Or if they were still being worked on.

Let me know if there are any questions.

Thanks

Shaun

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Tuesday, September 13, 2022 11:21 AM
To: Burke, Shaun <Burke.Shaun@epa.gov>
Cc: Haynes, James <haynes.james@epa.gov>
Subject: Region 6 VISR Reports

Hi Shaun,

I wanted to check in regarding the Providence Photonics Region 6 VISR Project Reports. I haven't received any deliverables or seen any other email traffic beyond the attached emails. Could you reach out to the Providence folks and see where they are with their reports? Their contact information is in the attached item.

Thank you,

Colleen McCarthy
Air Toxics Enforcement Section
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270
P: 214-665-7334
mccarthy.colleen01@epa.gov
(she/her/hers)

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Appointment

From: Frey, Sarah [frey.sarah@epa.gov]
Sent: 6/13/2022 9:20:22 PM
To: Frey, Sarah [frey.sarah@epa.gov]; Rosenthal, Benjamin [Rosenthal.Benjamin@epa.gov]; Donaldson, Benjamin [Donaldson.Benjamin@epa.gov]; Haynes, James [haynes.james@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]
Subject: PAT roundup
Location: Microsoft Teams Meeting
Start: 6/16/2022 8:00:00 PM
End: 6/16/2022 9:00:00 PM
Show Time As: Tentative

Required Attendees: Frey, Sarah; Rosenthal, Benjamin; Donaldson, Benjamin; Haynes, James
Optional Attendees: Leathers, James

Inspection Report Status (draft submitted, peer review signed, inspection report signed, or inspection report issued. Is it loaded to erouting? Is it webposted?)

R6 Plains Marketing
R6 Nucor
R6 MPLX (Pin Oaks)
R6 Americas Styrenics - St James Plant
R6 Evonik
R6 Phillips 66 Lake Charles
R6 Sasol
R6 Westlake Styrene Marine
R6 Union Carbide?
R6 OxyChem?

R5 Americas Styrenics - St James Plant
R5 Occidental Chemical Corp (OxyChem Convent)
R5 Dupont Pontchartrain Site (Diamines)
R5 Marathon Petroleum - Garyville Refinery
R5 Noranda Alumina
R5 Dow/Union Carbide
R5 Vopak St. Charles
R5 Pinnacle Polymer
R5 Koch Methanol

AED Lotte
AED Eagle US 2
AED Axiall
AED Evonik
AED NuStar

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Join with a video conferencing device

<sip:teams@video.epa.gov>

Video Conference ID: 118 973 837 7

[Alternate VTC instructions](#)

Or call in (audio only)

[+1 210-469-3886,277835630#](#) United States, San Antonio

Phone Conference ID: 277 835 630#

[Find a local number](#) | [Reset PIN](#)

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

[Learn More](#) | [Meeting options](#)

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/1/2022 5:44:24 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]
CC: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]; Leathers, James [Leathers.James@epa.gov]
Subject: RE: EPA Region 6 VISR Project - Summer 2022
Attachments: VISR Targets 0622.xlsx

From: Haynes, James
Sent: Monday, June 27, 2022 9:45 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

That is great!

I'll definitely keep you updated. I went back to our list, and I've tried to clean it up and make a few updates. Based on the Administrator's tour of Louisiana, I would like to focus on Calcasieu, St. James, and St. John the Baptist parishes. I'll try to finish that this week before the holiday and circulate to the group.

As far as logistics, I would like to stay in a centralized location for the SJ/SJTB parishes, but I want to plot everything out and see what makes sense. I'll set up something for next week so we can start looking at options.

Thanks.

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Friday, June 24, 2022 6:46 AM
To: Haynes, James <haynes.james@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

I have the green light to submit a TA for the week of 8/1-5. Can you loop me in on the planning? Do you have any plans/details already about where we'll be staying and what sites we'll be visiting?

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Haynes, James <haynes.james@epa.gov>
Sent: Tuesday, June 7, 2022 6:57 PM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher

<Williams.Christopher@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

Great! The initial thought was for Sunday (7/31) be a travel day, and start inspections Monday morning; however, we can talk about tweaking those plans or you could meet us after lunch. Or you could even arrive later Monday and start with us Tuesday morning.

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>

Sent: Tuesday, June 7, 2022 4:25 PM

To: Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

I'm interested and available. I'll be on annual leave during the entire two-week period preceding that week, but assuming Monday, 8/1 will be a travel day, I should be able to go that week.

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Bobbs, Nicholas <bobbs.nicholas@epa.gov>

Sent: Tuesday, June 7, 2022 11:20 AM

To: Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

Hey Dan,

Are you available/interested in participating in this project on August 1 – 5?

-Nick

From: Haynes, James <haynes.james@epa.gov>

Sent: Tuesday, June 7, 2022 9:58 AM

To: Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

AED is committing some funding, and I assumed Cary was going to attend if he hadn't retired – so that's no bueno. Should we see if Dan is available?

From: Williams, Christopher <Williams.Christopher@epa.gov>
Sent: Tuesday, June 7, 2022 6:27 AM
To: Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Haynes, James <haynes.james@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: Re: EPA Region 6 VISR Project - Summer 2022

I don't think I'll be able to attend.

Sincerely,

Chris

On Jun 6, 2022, at 10:44 PM, Bobbs, Nicholas <bobbs.nicholas@epa.gov> wrote:

I'm booked that week, but hopefully Chris is available.

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, June 6, 2022 9:49 AM
To: Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

I can make that week work with my schedule.

Colleen McCarthy

Life Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500
Dallas, Texas 75270
214-665-7334

From: Haynes, James <haynes.james@epa.gov>
Sent: Friday, June 3, 2022 3:00 PM
To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

EPA team – does this work for everyone's schedules?

I will make it work with my schedule, and hopefully AED can send someone down. Colleen, you were maybe going to have a conflict, right? Do you know when you will be certain about your availability?

From: Jon Morris <JonMorris@providencephotonics.com>
Sent: Thursday, June 2, 2022 3:28 PM
To: Jason Sese <Jason.Sese@erg.com>; Haynes, James <haynes.james@epa.gov>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

Hi James,

That's great news! Of those three weeks, Option 3 (August 1st – 5th) is the only one open on our schedule. I will block that week for now so it doesn't get scheduled for anyone else.

Best regards,



Jon Morris
Chief Technical Officer
☎ +1 225 333 0899



PROVIDENCE PHOTONICS
1201 Main Street, Baton Rouge, LA 70802
+1 833 746 8664 | www.providencephotonics.com

From: Jason Sese <Jason.Sese@erg.com>
Sent: Thursday, June 2, 2022 10:14 AM
To: Haynes, James <haynes.james@epa.gov>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>; Jon Morris <JonMorris@providencephotonics.com>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

[EXTERNAL EMAIL]

Good morning all,

As we are now in a new option period in our contract with EPA, we need to redo all the subcontracting paperwork and also complete the final QAPP revisions/approval. I think the 2nd or 3rd option may be doable, but I don't think option 1 will be enough time to get everything completed.

Thanks,
Jason

From: Haynes, James <haynes.james@epa.gov>
Sent: Thursday, June 2, 2022 11:03 AM
To: Yousheng Zeng, Ph.D., PE <youshengzeng@providencephotonics.com>; Jon Morris

<jonmorris@providencephotonics.com>

Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>

Subject: EPA Region 6 VISR Project - Summer 2022

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Good morning Yousheng and Jon,

I apologize for the numerous delays to get this project complete in Region 6. We appreciate your cooperation and patience in dealing with all of the obstacles that popped up in the past.

I am happy to say that we should have the green light (**Shaun – correct me if I'm wrong**) to schedule the project for this summer. On our end, EPA has tentatively picked out three weeks that could work for our schedules.

EPA Week 1 Option: June 27 – July 1

EPA Week 2 Option: July 18 – July 22

EPA Week 3 Option: August 1 – August 5

Our preference right now is the Week 2 Option. We would like to hear from Providence Photonics on your availability and preference so we can begin the logistics of the project.

Let me know if you have any questions.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/11/2022 10:19:04 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]; McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]
Subject: RE: EPA Region 6 VISR Project - Summer 2022
Attachments: VISR Itinerary.docx

From: Haynes, James
Sent: Friday, July 1, 2022 12:44 PM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

From: Haynes, James
Sent: Monday, June 27, 2022 9:45 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

That is great!

I'll definitely keep you updated. I went back to our list, and I've tried to clean it up and make a few updates. Based on the Administrator's tour of Louisiana, I would like to focus on Calcasieu, St. James, and St. John the Baptist parishes. I'll try to finish that this week before the holiday and circulate to the group.

As far as logistics, I would like to stay in a centralized location for the SJ/SJTB parishes, but I want to plot everything out and see what makes sense. I'll set up something for next week so we can start looking at options.

Thanks.

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Friday, June 24, 2022 6:46 AM
To: Haynes, James <haynes.james@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

I have the green light to submit a TA for the week of 8/1-5. Can you loop me in on the planning? Do you have any plans/details already about where we'll be staying and what sites we'll be visiting?

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division

(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Haynes, James <haynes.james@epa.gov>

Sent: Tuesday, June 7, 2022 6:57 PM

To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

Great! The initial thought was for Sunday (7/31) be a travel day, and start inspections Monday morning; however, we can talk about tweaking those plans or you could meet us after lunch. Or you could even arrive later Monday and start with us Tuesday morning.

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>

Sent: Tuesday, June 7, 2022 4:25 PM

To: Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

I'm interested and available. I'll be on annual leave during the entire two-week period preceding that week, but assuming Monday, 8/1 will be a travel day, I should be able to go that week.

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Bobbs, Nicholas <bobbs.nicholas@epa.gov>

Sent: Tuesday, June 7, 2022 11:20 AM

To: Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

Hey Dan,

Are you available/interested in participating in this project on August 1 – 5?

-Nick

From: Haynes, James <haynes.james@epa.gov>
Sent: Tuesday, June 7, 2022 9:58 AM
To: Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

AED is committing some funding, and I assumed Cary was going to attend if he hadn't retired – so that's no bueno. Should we see if Dan is available?

From: Williams, Christopher <Williams.Christopher@epa.gov>
Sent: Tuesday, June 7, 2022 6:27 AM
To: Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Haynes, James <haynes.james@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: Re: EPA Region 6 VISR Project - Summer 2022

I don't think I'll be able to attend.

Sincerely,

Chris

On Jun 6, 2022, at 10:44 PM, Bobbs, Nicholas <bobbs.nicholas@epa.gov> wrote:

I'm booked that week, but hopefully Chris is available.

From: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Sent: Monday, June 6, 2022 9:49 AM
To: Haynes, James <haynes.james@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: EPA Region 6 VISR Project - Summer 2022

I can make that week work with my schedule.

Colleen McCarthy
Life Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500
Dallas, Texas 75270
214-665-7334

From: Haynes, James <haynes.james@epa.gov>
Sent: Friday, June 3, 2022 3:00 PM
To: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>

Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

EPA team – does this work for everyone’s schedules?

I will make it work with my schedule, and hopefully AED can send someone down. Colleen, you were maybe going to have a conflict, right? Do you know when you will be certain about your availability?

From: Jon Morris <JonMorris@providencephotonics.com>

Sent: Thursday, June 2, 2022 3:28 PM

To: Jason Sese <Jason.Sese@erg.com>; Haynes, James <haynes.james@epa.gov>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>

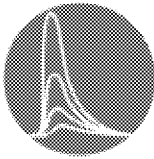
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

Hi James,

That’s great news! Of those three weeks, Option 3 (August 1st – 5th) is the only one open on our schedule. I will block that week for now so it doesn’t get scheduled for anyone else.

Best regards,



Jon Morris
Chief Technical Officer
☎ +1 225 333 0899



PROVIDENCE PHOTONICS
1201 Main Street, Baton Rouge, LA 70802
+1 833 746 8664 | www.providencephotonics.com

From: Jason Sese <Jason.Sese@erg.com>

Sent: Thursday, June 2, 2022 10:14 AM

To: Haynes, James <haynes.james@epa.gov>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>; Jon Morris <JonMorris@providencephotonics.com>

Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>

Subject: RE: EPA Region 6 VISR Project - Summer 2022

[EXTERNAL EMAIL]

Good morning all,

As we are now in a new option period in our contract with EPA, we need to redo all the subcontracting paperwork and also complete the final QAPP revisions/approval. I think the 2nd or 3rd option may be doable, but I don’t think option 1 will be enough time to get everything completed.

Thanks,
Jason

From: Haynes, James <haynes.james@epa.gov>
Sent: Thursday, June 2, 2022 11:03 AM
To: Yousheng Zeng, Ph.D., PE <youshengzeng@providencephotonics.com>; Jon Morris <jonmorris@providencephotonics.com>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; Leathers, James <Leathers.James@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>
Subject: EPA Region 6 VISR Project - Summer 2022

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Good morning Yousheng and Jon,

I apologize for the numerous delays to get this project complete in Region 6. We appreciate your cooperation and patience in dealing with all of the obstacles that popped up in the past.

I am happy to say that we should have the green light (**Shaun – correct me if I'm wrong**) to schedule the project for this summer. On our end, EPA has tentatively picked out three weeks that could work for our schedules.

EPA Week 1 Option: June 27 – July 1
EPA Week 2 Option: July 18 – July 22
EPA Week 3 Option: August 1 – August 5

Our preference right now is the Week 2 Option. We would like to hear from Providence Photonics on your availability and preference so we can begin the logistics of the project.

Let me know if you have any questions.

Thanks,
James

James S. Haynes
Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

VISR Itinerary

SUNDAY – 31 JULY

Evening: Check-in at Residence Inn New Orleans Elmwood (1080 Elmwood Park Boulevard, New Orleans, Louisiana 70123)

MONDAY – 1 AUGUST

Morning: Entry at **Americas Styrenics LLC – St. James Plant [1]**

Afternoon: Entry at **BASF Corp – Geismar Site [2]**

Evening: Residence Inn New Orleans Elmwood (overnight)

TUESDAY – 2 AUGUST

Morning: Entry at **DuPont de Nemours – Pontchartrain Works [3]**

Afternoon: Entry at **Enterprise Gas Processing – Norco Fractionation Plant [4]**

Evening: Residence Inn New Orleans Elmwood (overnight)

WEDNESDAY – 3 AUGUST

Morning: Check-out at Residence Inn New Orleans Elmwood
Entry at **Enterprise Products Operating – Baton Rouge Fractionators/PCU [5]**
Entry at **Placid Refining – Port Allen Refinery [6]**

Afternoon: Entry at **Kinetica Partners – Separation and Dehydration Station 508 [7]**

Evening: Check-in at SpringHill Suites Lake Charles (1551 West Prien Lake Road, Lake Charles, Louisiana, 70601)

THURSDAY – 4 AUGUST

Morning: Entry at **Indorama Ventures Olefins – Lake Charles Facility [8]**

Afternoon: Entry at **Sasol Chemicals – Lake Charles Chemical Complex [9]**

Evening: SpringHill Suites Lake Charles (overnight)

FRIDAY – 5 AUGUST

Morning; Check-out at SpringHill Suites Lake Charles
Entry at **Equistar Chemicals [10]**

Afternoon: Return home

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/18/2022 4:03:09 PM
To: Jon Morris [JonMorris@providencephotonics.com]; Yousheng Zeng, Ph.D., PE [YoushengZeng@providencephotonics.com]
CC: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Burke, Shaun [Burke.Shaun@epa.gov]; Jason Sese [Jason.Sese@erg.com]
Subject: VISR Itinerary for August 1-5
Attachments: VISR Itinerary.docx

ENFORCEMENT CONFIDENTIAL

Good morning.

I am attaching the draft itinerary for the VISR project. Also, I would like to set up a call next week to talk about the project details, so please let me know what times work for the Providence Photonics team.

Please let me know if there are any questions.

Thanks,
James

James S. Haynes
Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/27/2022 10:21:50 PM
To: Brian Fontenot [Brian.Fontenot@LA.GOV]
CC: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]; Leathers, James [Leathers.James@epa.gov]
Subject: RE: VISR Deployment Scheduled
Attachments: VISR Itinerary_draft.docx

Good evening Brian.

I apologize for the late notice – lots of things going on all at once... But we are scheduled to be in Louisiana next week for the VISR deployment. I have attached a draft itinerary.

Please let me know if you or anyone with DEQ would like to attend, and we can coordinate from there. As an FYI: these inspections will all be unannounced.

Again, apologies for the late notice. Hope to hear back.

Thanks,
James

From: Brian Fontenot <Brian.Fontenot@LA.GOV>
Sent: Monday, October 11, 2021 2:59 PM
To: Haynes, James <haynes.james@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Cc: Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>
Subject: RE: VISR Deployment Postponed

James,
Is there any update on the VISR deployment?

Also and this may be a question for James L., what is the latest on an EPA inspection at Blackwater Harvey?

Thanks!
Brian

From: Haynes, James <haynes.james@epa.gov>
Sent: Wednesday, August 18, 2021 12:09 PM
To: Brian Fontenot <Brian.Fontenot@LA.GOV>
Cc: Leathers, James <Leathers.James@epa.gov>; Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>; Stucky, Marie <Stucky.Marie@epa.gov>
Subject: VISR Deployment Postponed

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Brian,

Our management is uncertain about the delta/lambda variants present in Louisiana, and EPA is expected to issue new travel guidance soon. As of right now, we will need to postpone the project. We are working to get some available dates between our team and the contractors, but it is difficult situation because we are not able to forecast out what the situation will be in several weeks or months.

We appreciate your efforts and everyone at the regional office who has helped in the targeting. I will follow-up as soon as more information becomes available.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/20/2022 2:38:19 PM
To: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
Subject: HASP for PAT Project
Attachments: HASP for GMAP_PAT project_jsh_sf_bmr.JL.pdf

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 7/28/2022 5:56:56 PM
To: Jon Morris [JonMorris@providencephotonics.com]; Yousheng Zeng, Ph.D., PE [YoushengZeng@providencephotonics.com]
CC: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Burke, Shaun [Burke.Shaun@epa.gov]; Jason Sese [Jason.Sese@erg.com]
Subject: RE: VISR Itinerary for August 1-5
Attachments: VISR Itinerary_final.pdf

-----Original Appointment-----

From: Haynes, James
Sent: Monday, July 18, 2022 5:56 PM
To: Haynes, James; Jon Morris; Yousheng Zeng, Ph.D., PE
Cc: McCarthy, Colleen; Leathers, James; Hoyt, Daniel; Burke, Shaun; Jason Sese
Subject: VISR Itinerary for August 1-5
When: Thursday, July 28, 2022 2:00 PM-3:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Or join by entering a meeting ID

Meeting ID: 240 069 368 273

Passcode: F7bUaA

Join with a video conferencing device

sip:teams@video.epa.gov

Video Conference ID: 115 664 418 5

[Alternate VTC instructions](#)

Or call in (audio only)

[+1 210-469-3886,472320051#](#) United States, San Antonio

Phone Conference ID: 472 320 051#

[Find a local number](#) | [Reset PIN](#)

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

From: Jon Morris <JonMorris@providencephotonics.com>

Sent: Monday, July 18, 2022 5:36 PM

To: Haynes, James <haynes.james@epa.gov>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>

Subject: RE: VISR Itinerary for August 1-5

Hi James,

Thursday and Friday would be best for me next week.

Thursday: Before 8:00 AM CST or after 10:00 CST

Friday: Anytime

Thanks,



Jon Morris
Chief Technical Officer
☎ +1 225 333 0899



PROVIDENCE PHOTONICS
1201 Main Street, Baton Rouge, LA 70802
+1 833 746 8664 | www.providencephotonics.com

From: Haynes, James <haynes.james@epa.gov>

Sent: Monday, July 18, 2022 11:03 AM

To: Jon Morris <JonMorris@providencephotonics.com>; Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>

Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>

Subject: VISR Itinerary for August 1-5

[EXTERNAL EMAIL]

ENFORCEMENT CONFIDENTIAL

Good morning.

I am attaching the draft itinerary for the VISR project. Also, I would like to set up a call next week to talk about the project details, so please let me know what times work for the Providence Photonics team.

Please let me know if there are any questions.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

VISR Summer 2022 Project Itinerary

SUNDAY – 31 JULY

Evening: Check-in at Residence Inn New Orleans Elmwood (1080 Elmwood Park Boulevard, New Orleans, Louisiana 70123)

MONDAY – 1 AUGUST

Morning: **[1] Enterprise Gas Processing – Norco Fractionation Plant**

Afternoon: **[2] BASF Corp – Geismar Site**

Evening: Residence Inn New Orleans Elmwood (overnight)

TUESDAY – 2 AUGUST

Morning: **[3] Americas Styrenics LLC – St. James Plant**

Afternoon: **[4] DuPont de Nemours – Pontchartrain Works**

Evening: Residence Inn New Orleans Elmwood (overnight)

WEDNESDAY – 3 AUGUST

Morning: Check-out at Residence Inn New Orleans Elmwood
[5] Enterprise Products Operating – Baton Rouge Fractionators/PCU
[6] Placid Refining – Port Allen Refinery

Afternoon: **[7] Kinetica Partners – Separation and Dehydration Station 508**

Evening: Check-in at SpringHill Suites Lake Charles (1551 West Prien Lake Road, Lake Charles, Louisiana, 70601)

THURSDAY – 4 AUGUST

Morning: **[8] Sasol Chemicals – Lake Charles Chemical Complex**

Afternoon: **[9] Indorama Ventures Olefins – Lake Charles Facility**

Evening: SpringHill Suites Lake Charles (overnight)

FRIDAY – 5 AUGUST

Morning; Check-out at SpringHill Suites Lake Charles
[10] Equistar Chemicals

Afternoon: Return home

VISR Summer 2022 Project Targets

- [1]** Enterprise Gas Processing LLC - Norco Fractionation Plant
15608 Hwy 61
Norco, LA 70079
St. Charles Parish
- [2]** BASF Corp - Geismar Site
8404 River Rd (Hwy 75)
Geismar, LA 70734
Ascension Parish
- [3]** Americas Styrenics LLC - St James Plant
9901 Hwy 18
St. James, LA 70086
St. James Parish
- [4]** E I DuPont de Nemours & Co Inc - Pontchartrain Works
586 Hwy 44
Laplace, LA 70068
St. John the Baptist Parish
- [5]** Baton Rouge Act Frac/PCU
2220 N River Rd
Port Allen, LA 70767
West Baton Rouge Parish
- [6]** Placid Refining Co LLC - Port Allen Refinery
1940 LA Hwy 1 N
Port Allen, LA 70767
West Baton Rouge Parish
- [7]** Kinetica Partners LLC - Separation & Dehydration Station 508
37137 Hwy 3147
Kaplan, LA 70548
Vermilion Parish
- [8]** Sasol North America Inc - Lake Charles Chemical Complex
2201 Old Spanish Trail
Westlake, LA 70669
Calcasieu Parish
- [9]** Indorama Ventures Olefins LLC - Lake Charles Facility
4300 Hwy 108
Westlake, LA 70669
Calcasieu Parish
- [10]** Equistar Chemicals LP
4101 Hwy 108
Westlake, LA 70669
Calcasieu Parish

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 12/16/2021 5:36:15 PM
To: Leathers, James [Leathers.James@epa.gov]
Subject: RE: list of facilities where VISR is being planned
Attachments: VISR Targets August 2021.xlsx

Coordinates are on the right. I believe I've plotted them previously, and they are sort of accurate.

James S. Haynes

Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

From: Haynes, James
Sent: Wednesday, December 15, 2021 4:16 PM
To: Leathers, James <Leathers.James@epa.gov>
Subject: FW: list of facilities where VISR is being planned

See list below.

Let me know if you want the Excel file.

James S. Haynes

Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

From: Haynes, James
Sent: Monday, November 22, 2021 11:26 AM
To: Thompson, Steve <thompson.steve@epa.gov>
Cc: Chen, Justin <Chen.Justin@epa.gov>
Subject: RE: list of facilities where VISR is being planned

Hey Steve,

This is the full targeting list. We will only be able to make a subset of these, but if we need some backup sites (if a site is down or they are a batch plant) – we will pull from this list.

AI	AI_NAME	OWNER_NAME	ADDRESS1	CITY
1101	E I DuPont de Nemours & Co Inc - Pontchartrain Works	E I DuPont de Nemours & Co Inc	586 Hwy 44	Laplace
1136	Shell Chemical Co - Geismar Plant	Shell Chemical LP	7594 Hwy 75	Geismar

1253	Equistar Chemicals LP	Equistar Chemicals LP	4101 Hwy 108	Westlake
1357	Cornerstone Chemical Co	Cornerstone Chemical Co	10800 River Rd	Waggaman
1406	Motiva Enterprises LLC - Norco Refinery	Motiva Enterprises LLC	15536 River Rd	Norco
1409	The Dow Chemical Co - Louisiana Operations	The Dow Chemical Co	21255 Hwy 1	Plaquemine
1433	Lion Copolymer Geismar LLC - Geismar Facility	Lion Copolymer LLC	36191 Hwy 30	Geismar
2049	BASF Corp - Geismar Site	BASF Corp	8404 River Rd (Hwy 75)	Geismar
2366	Placid Refining Co LLC - Port Allen Refinery	Placid Refining Co LLC	1940 LA Hwy 1 N	Port Allen
2367	Syngenta Crop Protection LLC - St Gabriel Plant	Syngenta Crop Protection LLC	3905 Hwy 75	St. Gabriel
2384	Americas Styrenics LLC - St James Plant	Americas Styrenics LLC	9901 Hwy 18	St. James
2416	CF Industries Nitrogen LLC - Donaldsonville Nitrogen Complex	CF Industries Nitrogen LLC	39018 Hwy 3089	Donaldsonville
3271	Sasol North America Inc - Lake Charles Chemical Complex	Sasol Chemicals (USA) LLC	2201 Old Spanish Trail	Westlake
5337	Indorama Ventures Olefins LLC - Lake Charles Facility	Indorama Ventures Olefins LLC	4300 Hwy 108	Westlake
6164	Westlake Chemical OpCo LP	Westlake Chemical OpCo LP	900 Hwy 108	Sulphur
9061	Westlake Polymers LLC - Polyethylene I & II Plants	Westlake Polymers LLC	3525 Cities Service Hwy	Sulphur
18070	Westlake Styrene LLC - Styrene Monomer Production Facility	Westlake Styrene LLC	900 Hwy 108	Sulphur
27518	Westlake Petrochemicals LLC - Poly III	Westlake Petrochemicals LLC	900 Hwy 108	Sulphur
51546	Enterprise Gas Processing LLC - Norco Fractionation Plant	Enterprise Gas Processing LLC	15608 Hwy 61	Norco
83718	Lone Star NGL Refinery Services LLC - Geismar Fractionation Plant	Lone Star NGL Refinery Services LLC	10334 Hwy 75	Geismar
87883	Hexion Inc - Norco Facility	Hexion Inc	16122 River Rd	Norco
126578	Shintech Louisiana LLC - Plaquemine PVC Plant	Shintech Louisiana LLC	26270 Hwy 405 S	Plaquemine
158540	REG Geismar LLC	REG Geismar LLC	36187 Hwy 30	Geismar
168018	Diamond Green Diesel LLC - Green Diesel Plant	Diamond Green Diesel LLC	14891 Airline Dr	Norco
175505	DEXCO Polymers LP	DEXCO Polymers LP	21255 Hwy 1 Bldg 4350	Plaquemine
181192	Methanex USA LLC - Geismar I Methanol Plant	Methanex USA LLC	4171 Hwy 73	Geismar

As an FYI, the city color coding is only there to help us with planning purposes only.

The team had a quick call last Friday and we believe we will be ready to go in late January. Do you think we will be OK to schedule it with ERG and the contractors? Let me know if you have any other questions.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

From: Thompson, Steve <thompson.steve@epa.gov>

Sent: Monday, November 22, 2021 10:24 AM

To: Haynes, James <haynes.james@epa.gov>

Cc: Chen, Justin <Chen.Justin@epa.gov>

Subject: list of facilities where VISR is being planned

James,

Can you send me the target list of facilities?

Thanks,

Steve

Steve Thompson

Chief

Air Enforcement Branch

Enforcement and Compliance Assurance Division

EPA Region 6

1201 Elm Street, Suite 500

Dallas, Texas 75270

214-665-2769

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 8/8/2022 6:59:59 PM
To: Jon Morris [JonMorris@providencephotonics.com]
Subject: FW: Region 6 Flare Inspections w/ VISR

Hey Jon. I hope y'all made it back home safely.

Here is an FYI on the EMAX from Jason:

From: Dewees, Jason <Dewees.Jason@epa.gov>
Sent: Monday, August 8, 2022 1:20 PM
To: Haynes, James <haynes.james@epa.gov>; Buening, Hans <Buening.Hans@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>
Cc: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Region 6 Flare Inspections w/ VISR

James,

Wow, that looks like its going to be a great data set. I would extremely interested in looking at whatever doesn't get locked up in enforcement work.

As for the EMAX, we did add at hook for the VISR.

(xiv) In lieu of meeting the requirements in §§ 63.670 and 63.671 of subpart CC, an owner or operator may submit a request to the Administrator for approval of an alternative test method in accordance with § 63.7(f). The alternative test method must be able to demonstrate on an ongoing basis at least once every 15-minutes that the flare meets 96.5% combustion efficiency and provide a description of the alternative recordkeeping and reporting that would be associated with the alternative test method. The alternative test method request may also include a request to use the alternative test method in lieu of the pilot or flare flame monitoring requirements of 63.670(g).

Jason

From: Haynes, James <haynes.james@epa.gov>
Sent: Monday, August 8, 2022 11:10 AM
To: Dewees, Jason <Dewees.Jason@epa.gov>; Buening, Hans <Buening.Hans@epa.gov>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Foley, Patrick <Foley.Patrick@epa.gov>
Cc: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>
Subject: Region 6 Flare Inspections w/ VISR

Good morning,

I just wanted to send out a note following our inspections last week in Louisiana. We took three instruments out with us last week: **(1)** the Mantis (cooled; looks at 9 spectral bands); **(2)** the Mantis Lite (uncooled; looks at 4 spectral bands); and **(3)** the FLIR GF320 (cooled OGI camera).

I need to go back and review my notes, but we went to 11 different sites and recorded data for about 25 to 30 flares. There was a good mixture of unassisted, air-assisted, and steam-assisted flares. Here is a table showing the breakdown of where we visited:

FACILITY/OWNER	CITY
Enterprise Gas Processing LLC - Norco Fractionation Plant	Norco
BASF Corp - Geismar Site	Geismar
Americas Styrenics LLC - St James Plant	St. James
E I DuPont de Nemours & Co Inc - Pontchartrain Works	Laplace
Baton Rouge Act Frac/PCU	Port Allen
Placid Refining Co LLC - Port Allen Refinery	Port Allen
Sasol North America Inc - Lake Charles Chemical Complex	Westlake
Louisiana Integrated Polyethylene JV LLC	Westlake
Phillips 66 Co - Lake Charles Refinery	Westlake
Kinetica Partners LLC - Separation & Dehydration Station 508	Kaplan
Indorama Ventures Olefins LLC - Lake Charles Facility	Westlake

Once we get the data back, I will be sure to share that info with those interested. As an FYI – the last site we visited (Indorama) was very interested in submitting an AMP to use the VISR technology in lieu of the EMACT flare requirements. I told them OAQPS would likely have a final say on the approval, but they may still submit it to R6. If that happens, I will be reaching out.

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 8/10/2022 1:58:57 PM
To: McCarthy, Colleen [McCarthy.Colleen01@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]
Subject: Additional VISR Follow-up

Good morning.

As a quick FYI - I have sent out emails/OneDrive links to AmSty St. James, Enterprise Norco, and Indorama Westlake to get additional records.

I definitely still want to get info from BASF and Sasol... TBD on DuPont, Enterprise Port Allen, LIP, and Placid Refining. We can do a debrief next week and figure out next steps.

Thanks,
James

James S. Haynes
Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 8/22/2022 9:45:33 PM
To: Leger, Allyson (MA) [Mary.Idlett@us.sasol.com]
CC: Potgieter, Pieter (PP) [Pieter.Potgieter@us.sasol.com]; agueda.mayard@la.gov; Rosenthal, Benjamin [Rosenthal.Benjamin@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Bobbs, Nicholas [bobbs.nicholas@epa.gov]
Subject: RE: Mobile Air Monitoring

Hi Ms. Leger,

EPA has not publicly posted or transmitted monitoring data to any company regarding NEIC's GMAP deployment in April 2022. We expect that all of the data will be shared with companies and the public in the coming weeks; however, there is no firm timeline. In the interim, EPA is willing to lead a virtual meeting to walk through some of the data obtained with the GMAP and NEIC's analysis of the canisters taken at your site.

If you would like to meet virtually, please let us know your availability and I will set something up.

Thanks,

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

From: Leger, Allyson (MA) <Mary.Idlett@us.sasol.com>
Sent: Monday, August 22, 2022 1:30 PM
To: Haynes, James <haynes.james@epa.gov>; Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>
Cc: Potgieter, Pieter (PP) <Pieter.Potgieter@us.sasol.com>; agueda.mayard@la.gov
Subject: Mobile Air Monitoring

Dear Mr. Haynes and Mr. Rosenthal,

Sasol is writing to request copies of the data and any associated reports for mobile source air monitoring that was conducted at Sasol's Westlake, Louisiana chemical manufacturing plant on April 11, 2022 by the EPA with local LDEQ.

Sasol is aware that EPA has provided these data and reports to other facilities subject to monitoring around the same time.

Please provide this information to us at your earliest convenience. Do not hesitate to call if you would like to discuss this request.

Sincerely,
Allyson Leger



Sasol Chemicals (USA) LLC
2201 Old Spanish Trail
Westlake, LA 70669
www.sasolnorthamerica.com

Mary Allyson Leger
Environmental Manager

Tel: +1 337 494 5087
Mobile: +1 337 936 2347
E-mail: mary.idlett@us.sasol.com

Environmental awareness starts with each of us – think before you print this page

NOTICE: Please note that this eMail, and the contents thereof, is subject to the standard Sasol eMail legal notice which may be found at: <http://www.sasol.com/legal-notices>
If you cannot access the legal notice through the URL attached and you wish to receive a copy thereof please send an eMail to legalnotice@sasol.com

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 9/19/2022 7:03:17 PM
To: McPherson, Kenneth [McPherson.Kenneth@epa.gov]
Subject: FW: Region 6 - VISR Reports
Attachments: 0010-004-001 Enterprise Norco.pdf; EPA Region 6 Field Work - Complete.xlsx

From: Jon Morris <JonMorris@providencephotonics.com>
Sent: Tuesday, August 23, 2022 10:48 AM
To: Haynes, James <haynes.james@epa.gov>
Cc: Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>; Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: RE: Region 6 - VISR Reports

Hi James,

We got a little behind on our reporting but we're working on your data now. We generated quite a data set, 36 individual flare measurements. I think we only measured about 10 when we did this in Region 5. I think it will take about one more week to complete the reports.

Yes, a OneDrive would be best as we plan to deliver the FLIR videos and a radiometric video from the VISR device for each inspection. I think we should set up a drive with a folder for each site inspected.

We will be producing individual reports for each facility. I've attached a sample report for the first inspection we did, Enterprise Norco. Please take a look and let us know if this format and content looks good. Then we will use it as a template for the remainder of the reports.

I've also attached a list of all of the flares inspected, organized by site. It would be good to compare field notes, especially concerning flare IDs for the larger sites (BASF, Sasol, etc...). I noted the flare type (air assisted, steam assisted, unassisted) for some based on my field notes but I don't have a complete record of the flare type.

Thanks,
Jon

From: Haynes, James <haynes.james@epa.gov>
Sent: Monday, August 22, 2022 5:43 PM
To: Jon Morris <JonMorris@providencephotonics.com>
Cc: Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>; Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: Region 6 - VISR Reports

[EXTERNAL EMAIL]

Hi Jon,

First, no rush!!

I wanted to check in with you on the reports for the VISR project earlier this month and see if you have an idea for when they might be completed. I want to be able to keep my management updated on timelines. I will need to follow-up with a few companies to have them confirm whether their flares are assisted and flare IDs, so please let me know if you are going to want any of that information. If I recall correctly, one company was a little uncertain on a few things for some of their flares.

Finally, as you near completion of the reports, I will set up a OneDrive where you can upload the reports. Will that work?

Thanks,
James

James S. Haynes

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

From: Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]
Sent: 9/20/2022 6:01:33 PM
To: Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Leathers, James [Leathers.James@epa.gov]
Subject: RE: Region 6 - VISR Reports

Hi Dan.

I had a quick chat with James yesterday afternoon. He is going to take a stab at identifying some of the R6 HON and MON sources, and he will also look into a list of the previous flare efficiency cases. The R6 flare efficiency program left out refineries because of the changes to MACT CC, and so there was a focus on chemical plants. I expect most of the cases were at HON/MON sources; however, during the evaluations – the most common benchmark for enforcement was a steam to vent gas (S/VG) ratio greater than 10. This was considered egregious, and was clear over-steaming. If I remember correctly, anything greater than a S/VG ratio of 1 correlates to a drop in efficiency (and the NHVcz will dip below 270). Based on that information, there is probably a significant chunk of sites that did **NOT** have enforcement that may also have had excess emissions.

From the VISR, I had the most concerns about Sasol and BASF. I think it would make sense if all flares had to follow the MACT CC flare requirements, and I also think that would make it easier to evaluate and determine compliance. Once we get the reports, we will dig into the CE% and compare it to the company data. One thing we may run into (and this occurred during the flare efficiency evaluations) is that the company may not have all the data we need to calculate NHVcz on a 15-min block period due to lack of equipment (calorimeter or GC/MS).

One thing that puzzles me is why they have changed the MON and EMACT to include the new flare requirements referenced under MACT CC, but now they want to stop at the HON? That seems strange. Anyway, we will keep in touch.

Thanks,
James

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Friday, September 16, 2022 3:37 PM
To: Haynes, James <haynes.james@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: Region 6 - VISR Reports

Hey James and James,

There have been some discussions about the proposed rules for the HON and MON, and whether or not they should or will include flare requirements for monitoring and minimum net heating value in the combustion zone (NHVcz). My understanding is that OAR management thinks flare requirements for monitoring and minimum NHVcz are not needed for flares at HON and MON sources. I was asked if the VISR project will be useful to show that flare requirements for monitoring and minimum NHVcz are needed. I said probably not, but only because the HON and MON sources we evaluated during the VISR project are for the most part already operating under CAFOs with flare requirements for monitoring and minimum NHVcz [please let me know if you agree with that]. However, the Region 6 CAFOs addressing excessive over-steaming of flares at HON and MON sources might be good evidence that flare requirements for monitoring and minimum NHVcz are needed at HON and MON sources. Can one of you send me a list of the HON and MON sources in Region 6 that are subject to CAFOs that address evidence of over-assisted flares with CAFO flare requirements for monitoring and minimum NHVcz?

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Haynes, James <haynes.james@epa.gov>
Sent: Tuesday, August 23, 2022 2:47 PM
To: Jason Sese <Jason.Sese@erg.com>; Burke, Shaun <Burke.Shaun@epa.gov>; Jon Morris <JonMorris@providencephotronics.com>
Cc: Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotronics.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: RE: Region 6 - VISR Reports

Shaun/Jason: Thanks for the input on keeping all the contract people happy. God knows I don't have the patience to deal with them...

Jon: Perhaps the deliverables can be zipped into a folder for each site to help with the transfer? After going through Jason and Shaun, I will be sure to download and unzip them into the appropriate folders. As they start rolling in, please keep us in the loop to make sure we are tracking them. Hopefully that works for everyone.

As for the content of the reports, I will try to review this week with some folks to see if we have any suggestions for the template. Additionally, I will review your Excel file to compare with our notes, Louisiana permits, and the company.

Thanks,
James

James S. Haynes
Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

From: Jason Sese <Jason.Sese@erg.com>
Sent: Tuesday, August 23, 2022 11:08 AM
To: Burke, Shaun <Burke.Shaun@epa.gov>; Jon Morris <JonMorris@providencephotronics.com>; Haynes, James <haynes.james@epa.gov>
Cc: Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotronics.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: RE: Region 6 - VISR Reports

To keep all of our contracts folks happy, please send deliverables to me and I will route to Shaun.

Thanks,
Jason

~~~~~

Jason Sese  
Senior Chemical Engineer  
Eastern Research Group, Inc. (ERG)  
14555 Avion Parkway, Ste 200  
Chantilly, VA 20151

---

**From:** Burke, Shaun <Burke.Shaun@epa.gov>

**Sent:** Tuesday, August 23, 2022 12:01 PM

**To:** Jon Morris <jonmorris@providencephotonics.com>; Haynes, James <haynes.james@epa.gov>

**Cc:** Yousheng Zeng, Ph.D., PE <youshengzeng@providencephotonics.com>; Jason Sese <Jason.Sese@erg.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>

**Subject:** RE: Region 6 - VISR Reports

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Please send all deliverables and associated messages to me, and copy James, Colleen and Dan so we can keep our contract officer happy and make sure we don't get into any trouble in case of an audit.

Thanks

Shaun

---

**From:** Jon Morris <JonMorris@providencephotonics.com>

**Sent:** Tuesday, August 23, 2022 11:48 AM

**To:** Haynes, James <haynes.james@epa.gov>

**Cc:** Yousheng Zeng, Ph.D., PE <YoushengZeng@providencephotonics.com>; Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>

**Subject:** RE: Region 6 - VISR Reports

Hi James,

We got a little behind on our reporting but we're working on your data now. We generated quite a data set, 36 individual flare measurements. I think we only measured about 10 when we did this in Region 5. I think it will take about one more week to complete the reports.

Yes, a OneDrive would be best as we plan to deliver the FLIR videos and a radiometric video from the VISR device for each inspection. I think we should set up a drive with a folder for each site inspected.

We will be producing individual reports for each facility. I've attached a sample report for the first inspection we did, Enterprise Norco. Please take a look and let us know if this format and content looks good. Then we will use it as a template for the remainder of the reports.

I've also attached a list of all of the flares inspected, organized by site. It would be good to compare field notes, especially concerning flare IDs for the larger sites (BASF, Sasol, etc...). I noted the flare type (air assisted, steam assisted, unassisted) for some based on my field notes but I don't have a complete record of the flare type.

Thanks,  
Jon

---

**From:** Haynes, James <[haynes.james@epa.gov](mailto:haynes.james@epa.gov)>

**Sent:** Monday, August 22, 2022 5:43 PM

**To:** Jon Morris <[JonMorris@providencephotonics.com](mailto:JonMorris@providencephotonics.com)>

**Cc:** Yousheng Zeng, Ph.D., PE <[YoushengZeng@providencephotonics.com](mailto:YoushengZeng@providencephotonics.com)>; Burke, Shaun <[Burke.Shaun@epa.gov](mailto:Burke.Shaun@epa.gov)>;

Jason Sese <[Jason.Sese@erg.com](mailto:Jason.Sese@erg.com)>; McCarthy, Colleen <[McCarthy.Colleen01@epa.gov](mailto:McCarthy.Colleen01@epa.gov)>; Hoyt, Daniel

<[Hoyt.Daniel@epa.gov](mailto:Hoyt.Daniel@epa.gov)>

**Subject:** Region 6 - VISR Reports

**[EXTERNAL EMAIL]**

Hi Jon,

First, no rush!!

I wanted to check in with you on the reports for the VISR project earlier this month and see if you have an idea for when they might be completed. I want to be able to keep my management updated on timelines. I will need to follow-up with a few companies to have them confirm whether their flares are assisted and flare IDs, so please let me know if you are going to want any of that information. If I recall correctly, one company was a little uncertain on a few things for some of their flares.

Finally, as you near completion of the reports, I will set up a OneDrive where you can upload the reports. Will that work?

Thanks,

James

**James S. Haynes**

Physical Scientist

U.S. Environmental Protection Agency, Region 6

Air Toxics Enforcement Section

1201 Elm Street, Suite 500 (MC: ECDAT)

Dallas, Texas 75270

214-665-8546

Message

---

**From:** Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]  
**Sent:** 9/20/2022 10:16:55 PM  
**To:** McCarthy, Colleen [McCarthy.Colleen01@epa.gov]  
**CC:** Leathers, James [Leathers.James@epa.gov]  
**Subject:** FW: Region 6 Flare Inspections w/ VISR

FYI.

---

**From:** Haynes, James  
**Sent:** Tuesday, September 20, 2022 5:17 PM  
**To:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>  
**Subject:** RE: Region 6 Flare Inspections w/ VISR

I will be out of town the last part of October and early November. I can see if my coworker is interested in presenting to the NCI group, but let me get back to you later this week.

Thanks,  
James

---

**From:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>  
**Sent:** Tuesday, September 20, 2022 3:12 PM  
**To:** Haynes, James <haynes.james@epa.gov>  
**Subject:** RE: Region 6 Flare Inspections w/ VISR

Hi James,

Sounds good. We definitely would want to provide you sufficient time with the data before being asked to present.

Should we pencil you in for the November call or do you think you would need even more time beyond that?

Rob

---

**From:** Haynes, James <haynes.james@epa.gov>  
**Sent:** Tuesday, September 20, 2022 2:42 PM  
**To:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>  
**Subject:** RE: Region 6 Flare Inspections w/ VISR

Hi Rob.

That might be a little too soon. We are still trying to get the data from the contractor, so I want to make sure I have enough time to prepare and develop a presentation.

---

**From:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>  
**Sent:** Tuesday, September 20, 2022 10:33 AM  
**To:** Haynes, James <haynes.james@epa.gov>  
**Subject:** RE: Region 6 Flare Inspections w/ VISR

Hi James,



I wanted to follow-up on the VISR inspections recently conducted. I think the regions would be interested in learning more about the inspections, the technology used, and the results.

Would you be available to discuss on our next CCAC NCI call with the regions scheduled for **October 5**? Let me know and I'll put you on the agenda.

Thanks.

Rob

---

**From:** Haynes, James <[haynes.james@epa.gov](mailto:haynes.james@epa.gov)>

**Sent:** Monday, August 8, 2022 11:10 AM

**To:** Dewees, Jason <[Dewees.Jason@epa.gov](mailto:Dewees.Jason@epa.gov)>; Buenning, Hans <[Buenning.Hans@epa.gov](mailto:Buenning.Hans@epa.gov)>; Bouchard, Andrew <[Bouchard.Andrew@epa.gov](mailto:Bouchard.Andrew@epa.gov)>; Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>; Foley, Patrick <[Foley.Patrick@epa.gov](mailto:Foley.Patrick@epa.gov)>

**Cc:** Hoyt, Daniel <[Hoyt.Daniel@epa.gov](mailto:Hoyt.Daniel@epa.gov)>; McCarthy, Colleen <[McCarthy.Colleen01@epa.gov](mailto:McCarthy.Colleen01@epa.gov)>; Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Burke, Shaun <[Burke.Shaun@epa.gov](mailto:Burke.Shaun@epa.gov)>

**Subject:** Region 6 Flare Inspections w/ VISR

Good morning,

I just wanted to send out a note following our inspections last week in Louisiana. We took three instruments out with us last week: **(1)** the Mantis (cooled; looks at 9 spectral bands); **(2)** the Mantis Lite (uncooled; looks at 4 spectral bands); and **(3)** the FLIR GF320 (cooled OGI camera).

I need to go back and review my notes, but we went to 11 different sites and recorded data for about 25 to 30 flares. There was a good mixture of unassisted, air-assisted, and steam-assisted flares. Here is a table showing the breakdown of where we visited:

| FACILITY/OWNER                                               | CITY       |
|--------------------------------------------------------------|------------|
| Enterprise Gas Processing LLC - Norco Fractionation Plant    | Norco      |
| BASF Corp - Geismar Site                                     | Geismar    |
| Americas Styrenics LLC - St James Plant                      | St. James  |
| E I DuPont de Nemours & Co Inc - Pontchartrain Works         | Laplace    |
| Baton Rouge Act Frac/PCU                                     | Port Allen |
| Placid Refining Co LLC - Port Allen Refinery                 | Port Allen |
| Sasol North America Inc - Lake Charles Chemical Complex      | Westlake   |
| Louisiana Integrated Polyethylene JV LLC                     | Westlake   |
| Phillips 66 Co - Lake Charles Refinery                       | Westlake   |
| Kinetica Partners LLC - Separation & Dehydration Station 508 | Kaplan     |
| Indorama Ventures Olefins LLC - Lake Charles Facility        | Westlake   |

Once we get the data back, I will be sure to share that info with those interested. As an FYI – the last site we visited (Indorama) was very interested in submitting an AMP to use the VISR technology in lieu of the EMACT flare requirements. I told them OAQPS would likely have a final say on the approval, but they may still submit it to R6. If that happens, I will be reaching out.

Thanks,  
James

**James S. Haynes**

Physical Scientist  
U.S. Environmental Protection Agency, Region 6  
Air Toxics Enforcement Section  
1201 Elm Street, Suite 500 (MC: ECDAT)  
Dallas, Texas 75270  
214-665-8546

Message

---

**From:** Haynes, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HAYNES, JAMES]  
**Sent:** 7/28/2022 5:54:14 PM  
**To:** Mask, Kendra [Mask.Kendra@epa.gov]  
**CC:** Smalls, Eric [Smalls.Eric@epa.gov]; Leathers, James [Leathers.James@epa.gov]; McCarthy, Colleen [McCarthy.Colleen01@epa.gov]  
**Subject:** FW: Re: HASP review for upcoming Louisiana Inspections  
**Attachments:** HASP for VISR\_jh\_cm\_JL.pdf

As an FYI: I completed and passed my fit test last Thursday with Mike, but I'm not sure he has updated the databases yet. Hopefully he did, but I just wanted to flag that for you.

Thanks,  
James

---

**From:** Leathers, James <Leathers.James@epa.gov>  
**Sent:** Thursday, July 28, 2022 11:19 AM  
**To:** Mask, Kendra <Mask.Kendra@epa.gov>; Smalls, Eric <Smalls.Eric@epa.gov>  
**Cc:** McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Haynes, James <haynes.james@epa.gov>  
**Subject:** FW: Re: HASP review for upcoming Louisiana Inspections

Hi Kendra,

Eric was helping with our quickly approaching inspection HASP while you were out of the office. I don't want to create any duplicate efforts, but also want to try to facility review and approval to avoid any delays with these high priority inspections. Please let us know if there is anything additional you might need from Enforcement.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Leathers, James  
**Sent:** Wednesday, July 27, 2022 1:05 PM  
**To:** Smalls, Eric <[Smalls.Eric@epa.gov](mailto:Smalls.Eric@epa.gov)>  
**Cc:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>; Nelson, Michael <[Nelson.Michael@epa.gov](mailto:Nelson.Michael@epa.gov)>  
**Subject:** RE: Re: HASP review for upcoming Louisiana Inspections

Hi Eric,

Sorry for the error. I did sign earlier, but not selecting the red signature tab. I guess my earlier signature didn't get saved permanently, thanks for highlighting for me. I did review and sign the COVID JHA in the attached document. Please let me know if you need anything additional. Thanks!

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Smalls, Eric <[Smalls.Eric@epa.gov](mailto:Smalls.Eric@epa.gov)>  
**Sent:** Wednesday, July 27, 2022 12:25 PM  
**To:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Cc:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>; Nelson, Michael <[Nelson.Michael@epa.gov](mailto:Nelson.Michael@epa.gov)>  
**Subject:** RE: Re: HASP review for upcoming Louisiana Inspections

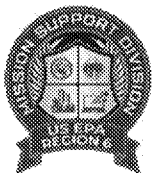
Hi James,

Before I move forward with the complete review & approval process of this HASP; could you acknowledge & digitally sign the EPA COVID-19 Job Hazard Analysis (JHA) Supplement. Please return the form to me once signed. Thanks

Regards,

Eric S. Smalls  
R6 Safety & Occupational Health Specialist  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street, Ste 500  
Dallas, TX 75270  
Work: 214.665.7223  
[Smalls.Eric@epa.gov](mailto:Smalls.Eric@epa.gov)

Mission Support Division



---

**From:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Sent:** Wednesday, July 27, 2022 11:13 AM  
**To:** Nelson, Michael <[Nelson.Michael@epa.gov](mailto:Nelson.Michael@epa.gov)>; Smalls, Eric <[Smalls.Eric@epa.gov](mailto:Smalls.Eric@epa.gov)>  
**Cc:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>  
**Subject:** FW: Re: HASP review for upcoming Louisiana Inspections

Hi Mike and Eric,

We are in another time crunch for an upcoming inspection with travel planned to start on 7/31. Is there someone that can review and authorize the attached HASP as acting for Kendra, or is it better to wait for Kendra to get back tomorrow. I worry that she might come back to a mass of other priorities and we can't get our HASP approved in time. Let me know if you have any suggestions to expedite our HASP approval.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Leathers, James  
**Sent:** Tuesday, July 26, 2022 7:16 AM  
**To:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>  
**Cc:** McCarthy, Colleen <[McCarthy.Colleen01@epa.gov](mailto:McCarthy.Colleen01@epa.gov)>; Haynes, James <[haynes.james@epa.gov](mailto:haynes.james@epa.gov)>  
**Subject:** Re: HASP review for upcoming Louisiana Inspections

Good Morning Kendra,

Attached is a HASP for some upcoming inspections in Louisiana. The inspections will be Flare focused, primarily surveying the flare from a distance, and potentially making entry when the FLIR or VISR observe potential excess emissions. Please let me or the Team know if you have any questions or need anything additional. Thanks

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [Leathers.James@epa.gov]  
**Sent:** 6/27/2022 7:37:47 PM  
**To:** Haynes, James [haynes.james@epa.gov]

No I was hoping that Justin got started with that, but it doesn't sound like it.

This whole thing is strange. The request and spoke is identical from FY 22 and FY 23. the Region was fine waiting, given all the other work we have to finish. However, NEIC management reached out to Steve and said they could fit the inspection in this year, and gave the September availability. This is the first time working through limiting the scope.

I don't know how helpful a LDAR/FLIR inspection would have been in January 22. I think they want something closer to the Sasol/LIP instead of the Indorama Westlake. I think we need something closer to Westlake for the Port Neches facility.

Message

---

**From:** Leathers, James [Leathers.James@epa.gov]  
**Sent:** 8/3/2022 11:48:10 PM  
**To:** Haynes, James [haynes.james@epa.gov]

wow that would be sweet.

By the way, if you didn't know, the agency did some external message today regarding EtO at sterilizers. In a related conversation, Cora Stern added this to the CCAC NCI chat. Top 10 EtO emitters. Not an EPA list, but blowing up R6.

Here are the top 10:

|                                                 |               |    |
|-------------------------------------------------|---------------|----|
| BASF CORP                                       | GEISMAR       | LA |
| HUNTSMAN PETROCHEMICAL LLC PORT NECHES FACILITY | PORT NECHES   | TX |
| BAXTER HEALTHCARE CORPORATION                   | MOUNTAIN HOME | AR |
| UNION CARBIDE                                   | HAHNVILLE     | LA |
| MIDWEST STERILIZATION CORP                      | LAREDO        | TX |
| SHELL CHEMICAL LP - GEISMAR PLANT               | GEISMAR       | LA |
| EQUISTAR CHEMICALS BAYPORT CHEMICALS PLANT      | PASADENA      | TX |
| SASOL CHEMICALS USA LLC                         | WESTLAKE      | LA |
| UNION CARBIDE CORP SEADRIFT PLANT               | SEADRIFT      | TX |
| EASTMAN CHEMICAL - TEXAS OPERATIONS             | LONGVIEW      | TX |

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/16/2022 12:15:02 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** Re: Draft email to DRA tracking facilities monitored

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams



Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/7/2022 8:22:30 PM  
**To:** Mask, Kendra [Mask.Kendra@epa.gov]  
**Subject:** FW: Re: Urgent HASP review for Journey to Justice Response  
**Attachments:** HASP for GMAP\_PAT project\_jsh\_sf\_bmr.JL.pdf

**Importance:** High

Just trying to get this last loose end tied up. Thanks for working with us to expedite this request.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Leathers, James  
**Sent:** Wednesday, April 06, 2022 3:57 PM  
**To:** Mask, Kendra <Mask.Kendra@epa.gov>  
**Subject:** FW: Re: Urgent HASP review for Journey to Justice Response  
**Importance:** High

Hi Kendra,

I remember you suggesting to make sure to mark these J2J hasps as High Importance. Not trying to rush you, but also didn't want it to get buried with all the others you are working on. Thanks

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Leathers, James  
**Sent:** Tuesday, April 05, 2022 6:13 PM

**To:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>

**Subject:** RE: Re: Urgent HASP review for Journey to Justice Response

Hi Kendra,

Attached is the HASP, with inspectors names and signatures (including the COVID supplement). Please review and let me know if you have any edits or concerns.

Many Thanks,

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>

**Sent:** Tuesday, April 05, 2022 12:09 PM

**To:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>

**Subject:** RE: Re: Urgent HASP review for Journey to Justice Response

Looks good. Just make sure to add the name of the inspectors on the COVID-19 Supplement. Justin Chen's name is currently on the COVID-19 Supplement, so this needs to be changed prior to everyone signing the HASP.

*Kendra C. Mask*

R6 Health & Safety Manager

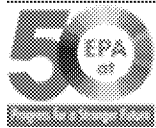
1201 Elm Street, Ste 500

Dallas, TX 75270

Work: 214.665.7225

Cell: 214.205.7643

[R6 H&S SharePoint Site](#)



---

**From:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>

**Sent:** Tuesday, April 5, 2022 10:21 AM

**To:** Mask, Kendra <[Mask.Kendra@epa.gov](mailto:Mask.Kendra@epa.gov)>

**Subject:** Re: Urgent HASP review for Journey to Justice Response

**Importance:** High

Hi Kendra,

Attached is a draft HASP for the PAT project. This is a project that will surveil numerous facilities in the Parishes that the Administrator visited during his Journey to Justice tour. The specific parishes are St. John the Baptist, St. James, and Calcasieu. Please let me know if you have comments or edits, before I have all inspectors sign. If the format and content look good, I will resend with all signatures as soon as I get your positive feedback. This request is urgent, since the deployment is scheduled for next week, starting 4/11. Any help to get this approved is greatly appreciated. In a separate email Sarah did get her defensive driving completed (also attached for ease of review).

There is another J2J response inspection at Sasol (Mossville area) for Justin Chen during the same time. Justin's HASP is unrelated to our GMAP Pollution Accountability Team (PAT) , but I am also adding that HASP for ease of review). That one was sent on 3/29/22 (in case you need to find the original request).

Please call if you have any questions.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/16/2022 10:09:18 PM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** Re: Draft email to DRA tracking facilities monitored

Highlight for emphasis of most recent days monitoring

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/19/2022 2:52:46 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4.18

Facilities monitored or inspected by the GMAP, Inspection Teams, or ASPECT

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (Louisiana Integrated Polyethylene) Additional facilities will be confirmed by ASPECT team on 4.19.22

James Leathers

Environmental Engineer

EPA Region 6

Chief, Air Toxics Enforcement Section

Dallas, TX 75270

(214) 665-6569

[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."



Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/19/2022 12:32:26 PM  
**To:** Delgado, Paige [Delgado.Paige@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]  
**CC:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** FW: PAT Facilities Monitored through 4/18

FYI,

See the last entry Highlighted. Anything we can add to this email update for ASPECT will be great.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Thompson, Steve <thompson.steve@epa.gov>  
**Sent:** Tuesday, April 19, 2022 7:08 AM  
**To:** Rodrigues, Cecil <rodrigues.cecil@epa.gov>  
**Cc:** Seager, Cheryl <Seager.Cheryl@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Leathers, James <Leathers.James@epa.gov>  
**Subject:** PAT Facilities Monitored through 4/18

Facilities monitored or inspected by the GMAP, Inspection Teams, or ASPECT

4.11.22  
GMAP  
Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams  
Americas Styrenics Llc - St James Plant

4.12.22  
GMAP  
Phillips 66 Lake Charles Refinery (completed same day)  
Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams  
Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (Louisiana Integrated Polyethylene) Additional facilities will be confirmed by ASPECT team on 4.19.22

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/20/2022 4:00:18 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4/19

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT

(Louisiana Integrated Polyethylene) Additional facilities will be confirmed by ASPECT team on 4.19.22

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agree to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

James Leathers

Environmental Engineer

EPA Region 6

Chief, Air Toxics Enforcement Section

Dallas, TX 75270

(214) 665-6569

[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express

permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/20/2022 2:10:23 PM  
**To:** Delgado, Paige [Delgado.Paige@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]  
**CC:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** FW: PAT Facilities Monitored through 4/19

Hi Paige and Matt,

In response to your Microsoft Team's message, I copied and paste the facilities monitored by the GMAP so far. I also highlighted the report out I have provided for the last two days of ASPECT monitoring. Let me know if you have dates and facilities you can confirm and add to the list. This email goes to DRA each morning, but I can add facilities for tomorrow's report out.

Facilities monitored by the GMAP

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

4.15.22

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

ASPECT

(Louisiana Integrated Polyethylene) Additional facilities will be confirmed by ASPECT team on 4.19.22

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agree to provide a Hot Work Permit to allow access into remaining process units )

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270

ED\_013639A\_00000677-00002

(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>  
**Sent:** Wednesday, April 20, 2022 8:13 AM  
**To:** Rodrigues, Cecil <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Cc:** Seager, Cheryl <[Seager.Cheryl@epa.gov](mailto:Seager.Cheryl@epa.gov)>; Gilrein, Stephen <[gilrein.stephen@epa.gov](mailto:gilrein.stephen@epa.gov)>; Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Subject:** PAT Facilities Monitored through 4/19

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)



Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

## Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

### GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

### GMAP

Evonik (completed same day)

NuStar (completed same day)

## Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

### ASPECT

(Louisiana Integrated Polyethylene) Additional facilities will be confirmed by ASPECT team on 4.19.22

4.19.22

### GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agree to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFCE94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/21/2022 4:32:34 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4/20

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (updated on 4.20.22)

Louisiana Integrated Polyethylene, Axiall, Sasol Chemical, and Phillips 66 Refinery

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agree to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

4.20.22

GMAP

Dow/Union Carbide (monitoring completed during second day of monitoring)

MPLX Terminal (former owner Pin Oaks Terminal)

Inspection Teams

Dow/Union Carbide (second day of inspection focused on olefins unit 1 and olefins unit 2, analyzer building, and junction boxes)

MPLX Terminal (former owner Pin Oaks Terminal) – Tanks focused inspection

ASPECT

Motiva Enterprises Convent Refinery, Cii Carbon Gramercy Facility, Mosaic Fertilizer - Uncle Sam Plant, Americas Styrenics - St James Plant, Occidental Chemical Corp, Valero Donaldsonville Asphalt Terminal, Mosaic Phosphates Co Faustina Plant, Noranda Alumina, NuStar St. James Terminal, Nucor Steel Louisiana, Millennium Galvanizing, and Plains Marketing

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/22/2022 3:46:51 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4/21

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (updated on 4.20.22)

Louisiana Integrated Polyethylene, Axiall, Sasol Chemical, and Phillips 66 Refinery

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agree to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT (updated on 4.21.22)

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

Pin Oak Terminals, Championx, Pinnacle Polymers LLC, Marathon Petroleum, Evonik Corp - Reserve Plant, Clariant Corp, DPC Enterprises, Noranda Alumina, Cii Carbon Gramercy.

4.20.22

GMAP

Dow/Union Carbide (monitoring completed during second day of monitoring)

MPLX Terminal (former owner Pin Oaks Terminal)

Inspection Teams

Dow/Union Carbide (second day of inspection focused on olefins unit 1 and olefins unit 2, analyzer building, and junction boxes)

MPLX Terminal (former owner Pin Oaks Terminal) – Tanks focused inspection

ASPECT

Motiva Enterprises Convent Refinery, Cii Carbon Gramercy Facility, Mosaic Fertilizer - Uncle Sam Plant, Americas Styrenics - St James Plant, Occidental Chemical Corp, Valero Donaldsonville Asphalt Terminal, Mosaic Phosphates Co Faustina Plant, Noranda Alumina, NuStar St. James Terminal, Nucor Steel Louisiana, Millennium Galvanizing, and Plains Marketing



4.21.22

GMAP

Occidental Chemical Corp (monitoring completed same day)

Plains Marketing LP (monitoring completed same day)

Americas Styrenics Llc - St James Plant (monitoring completed same day)

Inspection Teams

Vopak tank terminal (co-located with Union Carbide) Found issues with wastewater tank requiring repair, observed the EtO flare with the FLIR.

Directed by GMAP to inspect the Koch Methanol St James, located near the Plains Marketing tank terminal.

ASPECT

Sasol Chemicals Usa Llc, Axiall LLC Westlake, Louisiana Integrated Polyethylene Jv, Llc, and Phillips 66 Lake Charles Refinery (these facilities were re-assessed with better monitoring weather on 4.21.22).

All remaining Calcasieu facilities also assessed: Lotte Chemical MEG co-located with LACC Ethylene Plant, Eagle Us 2 Llc, Lake Charles Plant, Citgo Petroleum Corp, Westlake Chemical OpCo LP, Grace Davison Catalysts Plant, Arch Chemicals Inc, and Equistar Chemicals LP - Lake Charles Polymers Site.

James Leathers

Environmental Engineer

EPA Region 6

Chief, Air Toxics Enforcement Section

Dallas, TX 75270

(214) 665-6569

[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/23/2022 12:25:43 AM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4/22

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (updated on 4.20.22)

Louisiana Integrated Polyethylene, Axiall, Sasol Chemical, and Phillips 66 Refinery

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agreed to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

4.20.22

GMAP

Dow/Union Carbide (monitoring completed during second day of monitoring)

MPLX Terminal (former owner Pin Oaks Terminal)

Inspection Teams

Dow/Union Carbide (second day of inspection focused on olefins unit 1 and olefins unit 2, analyzer building, and junction boxes)

MPLX Terminal (former owner Pin Oaks Terminal) – Tanks focused inspection

ASPECT

Motiva Enterprises Convent Refinery, Cii Carbon Gramercy Facility, Mosaic Fertilizer - Uncle Sam Plant, Americas Styrenics - St James Plant, Occidental Chemical Corp, Valero Donaldsonville Asphalt Terminal, Mosaic Phosphates Co Faustina Plant, Noranda Alumina, NuStar St. James Terminal, Nucor Steel Louisiana, Millennium Galvanizing, and Plains Marketing

4.21.22

GMAP

Occidental Chemical Corp (monitoring completed same day)

Plains Marketing LP (monitoring completed same day)

Americas Styrenics Llc - St James Plant (monitoring completed same day)

Inspection Teams

Vopak tank terminal (co-located with Union Carbide) Found issues with wastewater tank requiring repair, observed the EtO flare with the FLIR.

Directed by GMAP to inspect the Koch Methanol St James, located near the Plains Marketing tank terminal.

4.22.22

GMAP

Denka Performance Elastomer (monitoring completed same day) 6 air Canister samples taken

Dupont Pontchartrain Site (monitoring completed same day)

Inspection Teams

Pinnacle Polymers Polypropylene Manufacturing Plant (general inspection)

James Leathers

Environmental Engineer

EPA Region 6

Chief, Air Toxics Enforcement Section

Dallas, TX 75270

(214) 665-6569

[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/26/2022 12:42:20 PM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** PAT Facilities Monitored through 4/23

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22

GMAP

Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams

Americas Styrenics Llc - St James Plant

4.12.22

GMAP

Phillips 66 Lake Charles Refinery (completed same day)

Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams

Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)

Occidental Chemical Corp (completed same day)

4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (updated on 4.20.22)

Louisiana Integrated Polyethylene, Axiall, Sasol Chemical, and Phillips 66 Refinery

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agreed to provide a Hot Work Permit to allow access into remaining process units )

Inspection Teams

Dow/Union Carbide (One full day of records review)

ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

4.20.22

GMAP

Dow/Union Carbide (monitoring completed during second day of monitoring)

MPLX Terminal (former owner Pin Oaks Terminal)

Inspection Teams

Dow/Union Carbide (second day of inspection focused on olefins unit 1 and olefins unit 2, analyzer building, and junction boxes)

MPLX Terminal (former owner Pin Oaks Terminal) – Tanks focused inspection

ASPECT

Motiva Enterprises Convent Refinery, Cii Carbon Gramercy Facility, Mosaic Fertilizer - Uncle Sam Plant, Americas Styrenics - St James Plant, Occidental Chemical Corp, Valero Donaldsonville Asphalt Terminal, Mosaic Phosphates Co Faustina Plant, Noranda Alumina, NuStar St. James Terminal, Nucor Steel Louisiana, Millennium Galvanizing, and Plains Marketing

4.21.22

GMAP

Occidental Chemical Corp (monitoring completed same day)

Plains Marketing LP (monitoring completed same day)

Americas Styrenics Llc - St James Plant (monitoring completed same day)

Inspection Teams

Vopak tank terminal (co-located with Union Carbide) Found issues with wastewater tank requiring repair, observed the EtO flare with the FLIR.

Directed by GMAP to inspect the Koch Methanol St James, located near the Plains Marketing tank terminal.

4.22.22

GMAP

Denka Performance Elastomer (monitoring completed same day) 6 air Canister samples taken

Dupont Pontchartrain Site (monitoring completed same day)

Inspection Teams

Pinnacle Polymers Polypropylene Manufacturing Plant (general inspection)

4.23.22

GMAP

NuCor (monitoring completed same day)

Motiva Enterprises Convent Refinery (monitored the perimeter and downwind, no emissions detected so entry was not made)

James Leathers

Environmental Engineer

EPA Region 6

Chief, Air Toxics Enforcement Section

Dallas, TX 75270

(214) 665-6569

[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 4/27/2022 12:10:51 PM  
**To:** Lannen, Justin [Lannen.Justin@epa.gov]  
**Subject:** FW: PAT Facilities Monitored through 4/23- FINAL

FYI

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>  
**Sent:** Tuesday, April 26, 2022 8:08 AM  
**To:** Rodrigues, Cecil <[rodrigues.cecil@epa.gov](mailto:rodrigues.cecil@epa.gov)>  
**Cc:** Seager, Cheryl <[Seager.Cheryl@epa.gov](mailto:Seager.Cheryl@epa.gov)>; Gilrein, Stephen <[gilrein.stephen@epa.gov](mailto:gilrein.stephen@epa.gov)>; Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Subject:** PAT Facilities Monitored through 4/23- FINAL

Facilities monitored or inspected by the GMAP or inspection teams

4.11.22  
GMAP  
Sasol and Louisiana Integrated Polyethylene Jv, Llc (completed same day)

Inspection Teams  
Americas Styrenics Llc - St James Plant

4.12.22  
GMAP  
Phillips 66 Lake Charles Refinery (completed same day)  
Too late in the day to make facility entry, so GMAP conducted roadside monitoring of Citgo Petroleum, Westlake South, Westlake Chemical OpCo, and Westlake Styrene LLC - Styrene Monomer Production Facility. Roadside monitoring at Westlake Styrene LLC - Styrene Monomer Production Facility and Citgo indicate the need to make entry at those facilities the following day for additional monitoring.

Inspection Teams  
Americas Styrenics Llc - St James Plant (completed on second day around 1 PM)  
Occidental Chemical Corp (completed same day)



4.13.22

GMAP

Lotte Chemical co-located with LACC Ethylene Plant (completed same day)

Eagle Us 2 Llc, Lake Charles Plant (completed same day)

Inspection Teams

Westlake Styrene LLC - Marine Terminal (completed same day)

Phillips 66 Lake Charles Refinery (completed same day)

Dupont Pontchartrain Site (completed same day – DuPont Diamines unit only)

Marathon Petroleum - Garyville Refinery (Inspection started and will continue for at least one additional day)

4.14.22

GMAP

Axiall LLC Westlake (completed same day)

Citgo Petroleum Corp (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (Second full day of Benzene focused Inspection)

4.15.22 (Week one Inspection teams begin demobilization and Week 2 inspectors will transition in for Monday)

GMAP

Marathon Petroleum - Garyville Refinery (completed same day)

Inspection Teams

Marathon Petroleum - Garyville Refinery (completed Benzene focused Inspection)

4.16.22 (Full day monitoring from public property in St. John the Baptist and St. James parishes. No entries were made to a facility)

GMAP

GMAP Monitored the residential areas surrounding Denka/DuPont. Extensively mapped the streets of the residential areas neighboring Denka/DuPont to the west and the north. The GMAP progressed west, monitoring around DCP Enterprises, Evonik, and Clariant. The GMAP also drove the highway past Pinnacle polymers. Further to the west, the GMAP monitored the areas surrounding Nalco/Evonik. The GMAP also drove past the Noranda/Atlantic alumina plant and downwind from the Rain CII Gramercy location. GMAP concluded the day by driving past all the facilities in St. James parish, including NuStar, on the closest downwind roadway.

4.18.22

GMAP

Evonik (completed same day)

NuStar (completed same day)

Inspection Teams

Noranda (completed general inspection)

Evonik (completed EtO focused inspection)

ASPECT (updated on 4.20.22)

Louisiana Integrated Polyethylene, Axiall, Sasol Chemical, and Phillips 66 Refinery

4.19.22

GMAP

Dow/Union Carbide (One full day of monitoring. The GMAP will require additional monitoring the next day, and the company has agreed to provide a Hot Work Permit to allow access into remaining process units )

#### Inspection Teams

Dow/Union Carbide (One full day of records review)

#### ASPECT

7 facilities monitored before refueling. 3 additional facilities were planned to be monitored. Facility names to be provided by the ASPECT team by 7:30 PM daily, starting April 20, 2022.

4.20.22

#### GMAP

Dow/Union Carbide (monitoring completed during second day of monitoring)

MPLX Terminal (former owner Pin Oaks Terminal)

#### Inspection Teams

Dow/Union Carbide (second day of inspection focused on olefins unit 1 and olefins unit 2, analyzer building, and junction boxes)

MPLX Terminal (former owner Pin Oaks Terminal) – Tanks focused inspection

#### ASPECT

Motiva Enterprises Convent Refinery, Cii Carbon Gramercy Facility, Mosaic Fertilizer - Uncle Sam Plant, Americas Styrenics - St James Plant, Occidental Chemical Corp, Valero Donaldsonville Asphalt Terminal, Mosaic Phosphates Co Faustina Plant, Noranda Alumina, NuStar St. James Terminal, Nucor Steel Louisiana, Millennium Galvanizing, and Plains Marketing

4.21.22

#### GMAP

Occidental Chemical Corp (monitoring completed same day)

Plains Marketing LP (monitoring completed same day)

Americas Styrenics Llc - St James Plant (monitoring completed same day)

#### Inspection Teams

Vopak tank terminal (co-located with Union Carbide) Found issues with wastewater tank requiring repair, observed the EtO flare with the FLIR.

Directed by GMAP to inspect the Koch Methanol St James, located near the Plains Marketing tank terminal.

4.22.22

#### GMAP

Denka Performance Elastomer (monitoring completed same day) 6 air Canister samples taken

Dupont Pontchartrain Site (monitoring completed same day)

#### Inspection Teams

Pinnacle Polymers Polypropylene Manufacturing Plant (general inspection)

4.23.22

#### GMAP

Nucor (monitoring completed same day)

Motiva Enterprises Convent Refinery (monitored the perimeter and downwind, no emissions detected so entry was not made)





United States Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEIC

**NEICVP1419E01**

**NEIC CIVIL INVESTIGATION REPORT**

**Mossville R6 GMAP**

Mossville, Louisiana 70669

**Investigation Date:**

April 25, 2021

**NEIC Project Team:**

**RICHARD  
HELMICH**

Digitally signed by  
RICHARD HELMICH  
Date: 2021.05.26  
16:52:04 -06'00'

Richard Helmich, Project Manager

**Authorized for Release by:**

**REBECCA  
CONNELL**

Digitally signed by REBECCA CONNELL  
DN: c=US, o=U.S. Government,  
ou=Environmental Protection Agency,  
cn=REBECCA CONNELL,  
0.9.2342.19200300.100.1.1=680010036719  
48  
Date: 2021.05.26 17:25:23 -06'00'

Rebecca Connell, Field Branch Chief, NEIC

**Report Prepared for:**

EPA Region 6  
1201 Elm Street – Suite 500  
Dallas, Texas 75270

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER

P.O. Box 25227  
Building 25, Denver Federal Center  
Denver, Colorado 80225

---

## CONTENTS

|                                                           |    |
|-----------------------------------------------------------|----|
| INVESTIGATION OVERVIEW .....                              | 3  |
| PROJECT OBJECTIVE .....                                   | 3  |
| INTRODUCTION TO GMAP TECHNOLOGY.....                      | 3  |
| OVERVIEW.....                                             | 4  |
| FIELD ACTIVITIES SUMMARY.....                             | 4  |
| GMAP Measurement Background, Activities, and Results..... | 5  |
| Field Measurement Activities .....                        | 11 |
| Field Measurement Quality .....                           | 12 |

## TABLES

|                                                                                                                           |    |
|---------------------------------------------------------------------------------------------------------------------------|----|
| Table 1. PROJECT TEAM MEMBERS .....                                                                                       | 3  |
| Table 2. SUMMARY OF FIELD MEASUREMENTS PERFORMED .....                                                                    | 5  |
| Table 3. GMAP DAILY ADJUSTED UCL, <sup>1</sup> OVERALL UCL, AND MDL <sup>2</sup><br>FOR MAPS CREATED APRIL 25, 2021 ..... | 8  |
| Table 4. ELEVATED GMAP READINGS .....                                                                                     | 11 |

## FIGURES

|                                                                                                        |    |
|--------------------------------------------------------------------------------------------------------|----|
| Figure 1. GMAP mapping runs, Mossville, Louisiana.....                                                 | 6  |
| Figure 2. Screen shot of Google Earth Pro image displaying GMAP data. ....                             | 9  |
| Figure 3. 210425_MA12: Reduced GPS signal due to trees along the road<br>blocking the GPS signal. .... | 12 |

## APPENDICES

|            |                               |
|------------|-------------------------------|
| Appendix A | GMAP kml files (25 kml files) |
| Appendix B | FLIR Videos (5 mp4 files)     |

**This Contents page shows all the sections contained in this report  
and provides a clear indication of the end of this report.**

---

## INVESTIGATION OVERVIEW

### PROJECT OBJECTIVE

U.S. Environmental Protection Agency (EPA) Region 6 (Region) requested the EPA National Enforcement Investigation Center (NEIC) to perform EPA draft Other Test Method (OTM) 33 “Geospatial Measurement of Air Pollution, Remote Emissions Quantification” measurements outside the fence line of various stationary sources of air pollution and the Mossville, Louisiana, public roads surrounding these locations. The project objective was to provide the Region with emission measurement data collected from public roadways surrounding the Phillips 66 Lake Charles Refinery and the Sasol Lake Charles Chemical Complex using Geospatial Measurement of Air Pollution (GMAP) technology. EPA draft OTM 33 measurements were supplemented with forward-looking infrared (FLIR) camera videos. FLIR cameras are capable of visualizing volatile organic compounds and are used to locate possible nearby emission sources when elevated readings are detected by GMAP. The Region provided guidance to NEIC on the roadways to traverse; however, additional locations were investigated with little additional time required. As stated in the quality assurance project plan, NEICVP1419P01, site entry was not part of this project. The project team is provided in **Table 1**.

| Table 1. PROJECT TEAM MEMBERS |              |                 |
|-------------------------------|--------------|-----------------|
| Name                          | Organization | Role            |
| Richard Helmich               | EPA-NEIC     | Project manager |
| Hans Buenning                 | EPA-NEIC     | Air inspector   |

The GMAP survey provided emission concentrations for methane (CH<sub>4</sub>); hydrogen sulfide (H<sub>2</sub>S); volatile organic compounds (VOCs); and benzene (BEN), toluene (TOL), ethylbenzene (ETB), m-xylene (XYM), o-xylene (XYO), and p-xylene (XYP) (collectively referred to as BTEX). GMAP technology is a screening tool that may help regulated entities, the government, and the public more easily find pollutant discharges, define environmental conditions, and identify emission sources.

### INTRODUCTION TO GMAP TECHNOLOGY

NEIC’s GMAP has the capacity to perform facility inspections using draft OTM 33<sup>1</sup> and draft OTM-33a.<sup>2</sup> NEIC’s GMAP consists of a vehicle equipped with the following: a cavity ring-down spectrometer (CRDS) for CH<sub>4</sub> and H<sub>2</sub>S measurements, a differential ultraviolet absorption spectrometer (DUVAS) for BTEX measurements, a photoionization detector (PID) for volatile organic compound (VOC) measurements, a global positioning system (GPS), a compact weather

---

<sup>1</sup> <https://www3.epa.gov/ttn/emc/prelim/otm33.pdf>

<sup>2</sup> <https://www3.epa.gov/ttn/emc/prelim/otm33a.pdf>

---

station that provides motion-corrected wind speed and direction, and a mechanism for collecting air canister samples.

Mapping data collected by GMAP while in motion can be visualized using Google Earth Pro (GEP) to help locate emission sources. Data collected while GMAP is stationary can be used to create weighted mean polar frequency plots,<sup>3</sup> where wind direction is the direction from the pole, wind speed is distance from the pole, and color represents concentration data. These polar plots can help locate emission sources. Under certain conditions, data collected while GMAP is stationary can be used to estimate the mass emission rate of a source using draft OTM-33a.

## OVERVIEW

Mossville is a small unincorporated community on the outskirts of Lake Charles in Calcasieu Parish, in southeast Louisiana. It is part of the Lake Charles Metropolitan Statistical Area and is located directly between Sulphur to the west and Westlake to the east.

## FIELD ACTIVITIES SUMMARY

All environmental measurement activities were performed in accordance with the NEIC quality system. All field sampling and measurements described in this report are within the scope of NEIC's ISO/IEC 17025 accreditation issued by the ANSI National Accreditation Board (certificate No. AT-1646), except for the motion-corrected anemometer. The GMAP motion-corrected anemometer cannot be calibrated as a complete system; therefore, the uncertainty of this instrument cannot be verified. The operating range stated by the manufacturer for CRDS is 0-300,000 parts per billion (ppb) for H<sub>2</sub>S with a precision of 0.4 percent (%). According to the manufacturer, DUVAS-measured compounds are linear to a value of 1,000 ppb. Readings greater than these values for CRDS and DUVAS measurements will have a higher uncertainty and may have interferences between compounds.

Richard Helmich and Hans Buenning conducted measurement activities during this investigation using GMAP. Hans Buenning collected FLIR GF320 infrared videos. **Table 2** summarizes field measurement activities. No samples were collected in the field for this project.

---

<sup>3</sup> <https://www.rdocumentation.org/packages/openair/versions/2.1-0/topics/polarFreq>

| Table 2. SUMMARY OF FIELD MEASUREMENTS PERFORMED |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                         |
|--------------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Location/Identifier<br>(Station/Sample No.)      | Dates          | Method/Equipment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Measurer Name                           |
| MEASUREMENTS                                     |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                         |
| 210425_MA01<br>through<br>210425_MA25            | April 25, 2021 | <b>Method:</b> EPA draft OTM 33:<br>Geospatial Measurement of<br>Air Pollution, Remote<br>Emissions Quantification<br><b>Equipment:</b> NEIC GMAP<br>consisting of: <ul style="list-style-type: none"> <li>• <b>Picarro CRDS</b><br/>Model: G2204<br/>Serial No.: 3227-BFADS2027</li> <li>• <b>DUVAS</b><br/>Model: DV3000<br/>Serial No.: DV1003</li> <li>• <b>PID sensor</b><br/>Part No.: 045-014<br/>Serial No.: 94001002</li> <li>• <b>Airmar weather station</b><br/>Model: 200WX<br/>Serial No.: 3445952<br/>Component of EPA<br/>Decal: B27317</li> <li>• <b>Hemisphere GPS</b><br/>Model: Crescent R100<br/>Serial No.: 0734-4068-003</li> </ul> | Richard Helmich<br>and<br>Hans Buenning |
| MOV_0001.mp4<br>through<br>MOV_0005.mp4          | April 25, 2021 | <b>Method:</b> FLIR ThermoCAM™<br>GasFindIR, GF320, and<br>Similar Infrared Cameras,<br>NEICPROC/11-005<br><b>Equipment:</b> FLIR GFx320<br>infrared imaging camera,<br>NEIC No. 12140, serial No:<br>74900849                                                                                                                                                                                                                                                                                                                                                                                                                                            | Hans Buenning                           |

The field logbook contains further information regarding the measurement and sampling activities performed for this project. All activities are described in further detail in the following sub-sections.

### GMAP Measurement Background, Activities, and Results

NEIC chemist Richard Helmich and NEIC inspector Hans Buenning performed draft OTM-33 air monitoring using NEIC's GMAP from accessible roadways on the perimeters and surrounding areas of various facilities in Mossville, including the Phillips 66 Lake Charles Refinery and the Sasol Lake Charles Chemical Complex, on April 25, 2021. The Region provided requested roadways for the survey to NEIC in advance. A total of 25 GMAP mapping runs were conducted to measure for CH<sub>4</sub>, H<sub>2</sub>S, VOCs, and BTEX. The routes traversed for all mapping runs are



depicted in **Figure 1**, some of which were repeated. The light-green lines shown on this mapping overview are intended only to show the routes traversed.



**Figure 1. GMAP mapping runs, Mossville, Louisiana.**

To easily evaluate datasets generated by GMAP, the data are converted to keyhole markup language (kml) files, which can be opened using GEP software. The GEP software allows for the dataset to be overlaid on a satellite image of the area. Analyte concentration readings, GPS locations, and meteorological data are recorded approximately every second.

The analyte concentrations are coded in a traffic-light-color-palette line or bar graphs. Low analyte concentrations are a green line or bar, with increasing concentrations corresponding to colors shifting from green to yellow to red. Concentration values lower than the mapping scale minimum (green) value appear as green lines. Concentrations higher than the mapping scale maximum (red) value appear as proportionally taller red bars. Each bar corresponds to a 2.5-meter distance travelled by the GMAP vehicle. The concentration value shown on the bar is the highest concentration value recorded inside that distance. Wind arrows are provided for each concentration bar only when the GMAP vehicle is moving slower than 25 miles per hour due to instrument limitations. The direction of the arrow is the wind direction, and the length of the arrow is proportional to the wind speed.

---

Not all facilities that are visited by the vehicle are measured. This can be due to inaccessibility, i.e., an inability to position the GMAP vehicle downwind of a facility. However, it can also be due to no concentrations above background.

### Overview of GMAP Mapping Surveys

NEIC collected GMAP measurements for CH<sub>4</sub>, H<sub>2</sub>S, VOCs, and BTEX. The three GMAP instruments, CRDS, DUVAS, and PID, are treated differently for GEP mapping purposes due to differences in the way data must be processed to generate representative maps of the data.

The CRDS CH<sub>4</sub> concentrations are reported in parts per million (ppm) and show an atmospheric background concentration of approximately 2.0 ppm. The signals from CH<sub>4</sub> emission sources comprise readings above the 2.0 ppm background. There are many sources of CH<sub>4</sub> emissions, not all of which are areas for concern. To avoid generating maps that do not warrant further investigation, mapping scales for CH<sub>4</sub> are fixed at 2 ppm minimum (green) and 4 ppm maximum (red), unless otherwise noted. Values greater than 4 ppm appear as proportionally taller red bars. All CH<sub>4</sub> maps are created, regardless of their maximum value, so that areas surveyed without significant emissions can be seen on the maps.

The CRDS H<sub>2</sub>S concentrations are reported in parts per billion. Based on the CRDS H<sub>2</sub>S detection limits, H<sub>2</sub>S concentrations are mapped when the highest concentration in the file exceeds 20 ppb. Mapping scales are set at a minimum (green), equal to 10 ppb, and to a maximum (red), equal to 30 ppb. Values greater than 30 ppb appear as proportionally taller red bars.

DUVAS BTEX concentration units are parts per billion. DUVAS analyte concentrations require special processing because of the manner in which the DUVAS instrument generates concentration data. Mapping scales are adjusted to make the observed plumes appear on the map; reported values are not corrected for zero offsets. 40 Code of Federal Regulations Part 136, Appendix B, "Definition and Procedure for the Determination of the Method Detection Limit," is used to determine the 95 percent upper confidence limit (UCL) of the method detection limit (MDL) for all GMAP BTEX concentration values. Positive zero offset values calculated by averaging instrument zero checks performed at the beginning and end of each sampling day are added to the UCL to determine each day's adjusted UCL for each BTEX analyte. BTEX zero offset adjustments are necessary due to limitations of the DUVAS instrument.

Each BTEX analyte's daily adjusted UCL (listed by date), UCL, and MDL are presented in **Table 3**. The DUVAS instrument settings were changed on April 22, 2021, to include the measurement of sulfur dioxide. Since the instrument settings were changed for measurements on this day, separate control limits and detection limits were calculated. The scale used for each BTEX

analyte in the GEP maps is fixed for each sampling day at a minimum (green) equal to the MDL, plus positive daily zero offsets to a maximum (red) equal to two times the UCL plus positive daily zero offsets. Values greater than two times the adjusted UCL, plus positive daily zero offsets, appear as proportionally taller red bars.

| Table 3. GMAP DAILY ADJUSTED UCL, <sup>1</sup> OVERALL UCL, AND MDL <sup>2</sup> FOR MAPS CREATED APRIL 25, 2021 |               |               |                    |                |                |                |                      |
|------------------------------------------------------------------------------------------------------------------|---------------|---------------|--------------------|----------------|----------------|----------------|----------------------|
| Daily Adjusted UCL                                                                                               | Benzene (ppb) | Toluene (ppb) | Ethylbenzene (ppb) | o-Xylene (ppb) | m-Xylene (ppb) | p-Xylene (ppb) | Sulfur Dioxide (ppb) |
| 4/25/2021                                                                                                        | 18            | 15            | N/A <sup>3</sup>   | 102            | N/A            | 16             | N/A                  |
| Overall UCL                                                                                                      | 15            | 15            | N/A                | 92             | N/A            | 10             | N/A                  |
| MDL                                                                                                              | 7             | 7             | N/A                | 42             | N/A            | 5              | N/A                  |
| <sup>1</sup> UCL: upper control limit.                                                                           |               |               |                    |                |                |                |                      |
| <sup>2</sup> MDL: method detection limit.                                                                        |               |               |                    |                |                |                |                      |
| <sup>3</sup> N/A: not available, analyte data not collected.                                                     |               |               |                    |                |                |                |                      |

The PID is calibrated with isobutylene, and all reported values for VOCs are parts per billion as isobutylene. Due to wide natural variances in background concentration and to the many sources of VOCs, not all of which are areas for concern, VOCs are not mapped unless there is a difference between the highest and lowest VOC value in a file of at least 200 ppb, unless otherwise noted. VOC map scales are set to the file minimum value, plus 100 for the map scale minimum (green) and the file minimum value, plus 300 for the map scale maximum (red), unless otherwise noted.

As discussed earlier, the concentration values derived from the GMAP datasets are visualized using GEP software. The datasets are converted to kml files using custom software. For each day that GMAP datasets were collected, a separate kml was created containing all CH<sub>4</sub> concentrations and the H<sub>2</sub>S and BTEX concentrations noted in the “Elevated GMAP Readings” table (**Table 4**). All VOC mapping files with a concentration noted in the “Elevated GMAP Readings” table (**Table 4**) have a unique kml file.

### Reading GMAP Results

GEP is a free software program that may be downloaded and installed from the internet. Controls in the upper right of the GEP image allow the user to turn the view and to set the magnification so that the image can be seen from the best perspective. After the software is installed, double-clicking a kml file will open the file in GEP under “Temporary Places” in the “Places” box on the left side of the screen. **Figure 2** is a screenshot of a GEP image showing selected data from the kml file 210425 Maps.kml, created on April 25, 2021. Double-clicking a second file will open that file, along with any others already open in GEP.



Figure 2. Screen shot of Google Earth Pro image displaying GMAP data.

Note the check boxes and dropdown arrows in the “Places” box. The dropdown arrows control the level of information that can be viewed in the “Places” box. **Figure 2** shows the individual mapping files located within the daily file; information for the nineteenth map run (210425\_MA19) is visible. The check boxes control what is displayed on the GEP image. In **Figure 2**, for 210425\_MA19, start-end icons, wind arrows, average wind arrow (located at the end icon), and hydrogen sulfide (H<sub>2</sub>S) concentration bars are displayed. If the concentration data are displayed in the “Places” box, clicking a concentration bar in the image will highlight the concentration value in the “Places” box. Clicking the dropdown arrow next to the wind check box and clicking on an individual wind arrow in the image would highlight the wind speed and direction for that wind arrow.

Upon opening 210425 Maps.kml, all concentration maps, icons, and wind data are displayed simultaneously. However, all data for the view in **Figure 2** have been turned off by clicking the check box next to 210425 Maps.kml so that the nineteenth H<sub>2</sub>S map for this day and its wind data can be examined more closely. This map shows the highest measured concentration of H<sub>2</sub>S in this mapping file. The concentration maximum scale is fixed such that it will appear as a red bar representing a height of 25 meters. In **Figure 2**, all concentrations greater than the maximum-scale value are red, representing a height greater than 25 meters in proportion to the concentration. The green concentration bars represent values that would not represent elevated XYP concentrations. For DUVAS-generated concentrations, yellow or orange concentration bars represent values that would require some corroborating evidence to establish high confidence that they are true readings and not instrument noise outliers.

---

Corroboration could be the presence of a known source directly upwind, concentration of other compounds at the same place, or red or higher values adjacent to the yellow bar.

GEP has features that allow the user to generate jpeg images from the image on the screen. The user can add icons with labels to the maps. Legends, titles, and other information can be added to the jpeg images.

When the wind direction is changing frequently, a measured concentration may also be from an emitted plume that has been blown back to the source. Large obstructions such as tanks also have wakes that can generate local winds opposite of the prevailing wind direction. Additionally, the wind speed and direction sensor is located on top of the moving vehicle and can be affected by the vehicle wake in some instances. The wind direction is determined with an internal magnetic compass that also may be affected by local magnetic fields. It would be prudent to closely examine all the available data, including concentration maps in the immediate vicinity for all compounds, as well as FLIR videos, air canister samples, source characteristics, and polar plots available around a source to decide where further investigation would be warranted. Currently, GMAP data is best used to screen for areas where further investigation using more traditional leak detection and repair techniques will be most useful.

### **GMAP Elevated Readings**

Maximum concentration readings collected by GMAP are shown in **Table 4**. Only concentrations with associated GEP maps are shown in the table; they can be considered as concentrations elevated above background levels. Mapping and stationary concentrations meeting the threshold to appear as red bars in the kml file (as defined in “Overview of GMAP Mapping Surveys”) appear as ***bold red italics*** in the table. The 25 maps generated from the datasets collected with GMAP are saved as kml files located in **Appendix A**. Some kml files contain multiple maps. “Delta VOC” values are the difference between the lowest and highest value in the file; VOC maps show the highest value in the file. The sources of elevated readings were tracked back to the source based on the localized wind and visualized using a FLIR camera.

| Table 4. ELEVATED GMAP READINGS                                                                                                                                                                                                                                                                                                        |               |                        |               |               |                                 |                             |                             |                |                                   |                 |                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|------------------------|---------------|---------------|---------------------------------|-----------------------------|-----------------------------|----------------|-----------------------------------|-----------------|-----------------------------------------------|
| Filename                                                                                                                                                                                                                                                                                                                               | Methane (ppm) | Hydrogen Sulfide (ppb) | Benzene (ppb) | Toluene (ppb) | Ethylbenzene (ppb) <sup>1</sup> | o-Xylene (ppb) <sup>2</sup> | m-Xylene (ppb) <sup>1</sup> | p-Xylene (ppb) | Sulfur Dioxide (ppb) <sup>1</sup> | Delta VOC (ppb) | Possible Cause of Elevated Readings           |
| 210425_MA01                                                                                                                                                                                                                                                                                                                            | 2.57          | 22                     |               |               |                                 | 107                         |                             | 17             |                                   | 51              | Unknown source south of Lake Charles bridge.  |
| 210425_MA06                                                                                                                                                                                                                                                                                                                            | 2.14          |                        |               |               |                                 |                             |                             | 17             |                                   |                 | Unknown source.                               |
| 210425_MA07                                                                                                                                                                                                                                                                                                                            | 2.34          |                        |               |               |                                 | 114                         |                             |                |                                   |                 | Unknown source.                               |
| 210425_MA12                                                                                                                                                                                                                                                                                                                            | 2.76          | 45                     |               |               |                                 |                             |                             |                |                                   |                 | Unknown source south of East Burton Street.   |
| 210425_MA13                                                                                                                                                                                                                                                                                                                            | 2.72          | 280                    |               |               |                                 |                             |                             |                |                                   |                 | Unknown source south of East Burton Street.   |
| 210425_MA14                                                                                                                                                                                                                                                                                                                            | 4.41          | 200                    |               |               |                                 |                             |                             |                |                                   | 65              | Unknown source south of East Burton Street.   |
| 210425_MA15                                                                                                                                                                                                                                                                                                                            | 2.10          | 22                     |               |               |                                 |                             |                             |                |                                   | 33              | Phillips66 tanks south of East Burton Street. |
| 210425_MA16                                                                                                                                                                                                                                                                                                                            | 2.98          | 608                    |               |               |                                 |                             |                             |                |                                   | 203             | Phillips66 tanks south of East Burton Street. |
| 210425_MA17                                                                                                                                                                                                                                                                                                                            | 3.13          | 879                    |               |               |                                 |                             |                             |                |                                   | 284             | Phillips66 tanks south of East Burton Street. |
| 210425_MA18                                                                                                                                                                                                                                                                                                                            | 3.68          | 1070                   |               |               |                                 |                             |                             |                |                                   | 398             | Phillips66 tanks south of East Burton Street. |
| 210425_MA19                                                                                                                                                                                                                                                                                                                            | 3.25          | 878                    |               |               |                                 |                             |                             |                |                                   | 358             | Phillips66 tanks south of East Burton Street. |
| 210425_MA20                                                                                                                                                                                                                                                                                                                            | 2.70          | 585                    |               |               |                                 |                             |                             |                |                                   | 161             | Phillips66 tanks south of East Burton Street. |
| <sup>1</sup> Data was not collected for these compounds due to possible interferences from the compounds that were measured.                                                                                                                                                                                                           |               |                        |               |               |                                 |                             |                             |                |                                   |                 |                                               |
| <sup>2</sup> Instrument problems encountered during calibration for o-xylene resulted in erroneously elevated concentration measurements for this compound. See “Field Measurement Quality” section for additional information. Other concentration measurements should be examined to determine the positive presence of an emission. |               |                        |               |               |                                 |                             |                             |                |                                   |                 |                                               |

## Field Measurement Activities

NEIC used a FLIR model GFx320 infrared imaging camera to attempt to locate sources of emissions found using GMAP. Five FLIR videos of gaseous emissions were recorded and are summarized in **Appendix B**. The FLIR camera has a bandpass filter on the detector to limit the image to a narrow band of the infrared spectrum where many hydrocarbons have spectral

signatures; this allows the FLIR camera to image gas-phase hydrocarbon emissions. The FLIR camera can also be set to high-sensitivity mode, in which image subtraction is performed to highlight the movement characteristic of gaseous emissions.

### Field Measurement Quality

Quality issues were identified in the GMAP datasets collected on April 25, 2021. The GPS signal was blocked by trees while the GMAP vehicle was driving on Burton Road, causing an erroneous location to be reported shown in **Figure 3**. The correct track is provided by the yellow dashed line.



Figure 3. 210425\_MA12: Reduced GPS signal due to trees along the road blocking the GPS signal.

The DUVAS instrument was set to collect spectra between 240 and 275 nanometers. Testing by Cary Secrest with EPA's Air Enforcement Division indicated that ethylbenzene and o-xylene have a poor response in this range.<sup>4</sup> This is reflected by the high control limit measured on April 25, 2021, upper control limit, and method detection limit shown in **Table 3**. Measurement results for this compound should not be relied upon as a potential emission detected. Other results, such as VOCs, should be used instead.

<sup>4</sup> Cary Secrest, email message to author, March 19, 2021.

---

Currently, GMAP data is best used to screen for areas where further investigation using more traditional leak detection and repair techniques will be most useful and there are no specific regulatory requirements associated with GMAP data.



Appendix A  
Mapping Log

VP1419  
Mossville R6 GMAP  
Mossville, Louisiana

Please see folder with electronic KML files sent with project report.

Appendix B  
FLIR Video Log

VP1419  
Southland R4 GMAP  
Mossville, Louisiana

5 pages

| File Name    | Date/Time | Thermographer | Location             | Potential Source  | Video Length | Description                                | Associated Mapping Files                                                                    |
|--------------|-----------|---------------|----------------------|-------------------|--------------|--------------------------------------------|---------------------------------------------------------------------------------------------|
| MOV_0001.mp4 | 4/25/2021 | Buenning      | Phillips 66 Refinery | Refinery flare    | 0:52         | Refinery flare viewed from Barton Road.    | None                                                                                        |
| MOV_0002.mp4 | 4/25/2021 | Buenning      | Phillips 66 Refinery | Refinery flare    | 0:40         | Refinery flare viewed from Barton Road.    | None                                                                                        |
| MOV_0003.mp4 | 4/25/2021 | Buenning      | Phillips 66 Refinery | Vent on tank 2001 | 0:37         | Vent on tank 2001 viewed from Barton Road. | 210425_MA14;<br>210425_MA16;<br>210425_MA17;<br>210425_MA18;<br>210425_MA19;<br>210425_MA20 |
| MOV_0004.mp4 | 4/25/2021 | Buenning      | Phillips 66 Refinery | Base of tank 2001 | 0:57         | Base of tank 2001 viewed from Barton Road. | 210425_MA14;<br>210425_MA16;<br>210425_MA17;<br>210425_MA18;<br>210425_MA19;<br>210425_MA20 |
| MOV_0005.mp4 | 4/25/2021 | Buenning      | Phillips 66 Refinery | Base of tank 2001 | 1:10         | Base of tank 2001 viewed from Barton Road. | 210425_MA14;<br>210425_MA16;<br>210425_MA17;<br>210425_MA18;<br>210425_MA19;<br>210425_MA20 |

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 6/9/2022 9:58:32 PM  
**To:** Mask, Kendra [Mask.Kendra@epa.gov]  
**CC:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** Fwd: EPA's Pollution Accountability Team (PAT) project

Hi Kendra,

Can you please review the email below and advise or contact Mr. Champagne.

I asked Brian if he was requesting the actual incident report that Sarah Frey submitted to you regarding a potential benzene exposure during a Pollution Accountability Team inspection (April of 2022) or just a narrative description of the potential exposure. Brian said the request was for the formal incident report but that Mr. Champagne would know exactly what is needed and how it would be used.

Please Let me know if you can advise next steps or if you have any questions. Thanks

Begin forwarded message:

**From:** Brian Fontenot <Brian.Fontenot@la.gov>  
**Date:** June 9, 2022 at 1:27:50 PM CDT  
**To:** "Leathers, James" <Leathers.James@epa.gov>  
**Cc:** "jared.champagne" <jared.champagne@la.gov>, "brian.tusa" <brian.tusa@la.gov>  
**Subject:** RE: EPA's Pollution Accountability Team (PAT) project

Hi James,

As we discussed on our phone call yesterday, I'm sending this email as a second request for an incident/exposure report for the 04/21/2022 benzene exposure of the PAT members. I have cc'd Mr. Jared Champagne, from LDEQ's Human Resources Section and whom needs this report, and Mr. Brian Tusa, LDEQ's Surveillance Administrator. If this needs to move up or to another section within EPA and/or Region 6, please let us know. Thank you for your cooperation in this matter!

Brian Fontenot, Environmental Scientist Senior - Air  
La. Dept. of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
111 New Center Dr.  
Lafayette, LA 70508  
(337) 262-5577  
(337) 258-3071 (cell)  
(337)262-5593 (fax)



---

**From:** Brian Fontenot

**Sent:** Friday, April 29, 2022 9:36 AM

**To:** 'Lundelius.Diana@epa.gov' <Lundelius.Diana@epa.gov>; 'Leathers, James' <Leathers.James@epa.gov>; 'Rosenthal, Benjamin' <Rosenthal.Benjamin@epa.gov>

**Subject:** FW: EPA's Pollution Accountability Team (PAT) project

Good morning and Happy Friday all!

Was there an EPA incident/exposure report filed by EPA regarding the 04/21/2022 benzene exposure to the PAT members at Americas Styrenics (see field notes & highlighted sections below)? If so, could I please receive a copy of it? Thank you in advance!

Brian Fontenot, Environmental Scientist Senior - Air  
La. Dept. of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
111 New Center Dr.  
Lafayette, LA 70508  
(337) 262-5577  
(337) 258-3071 (cell)  
(337)262-5593 (fax)



---

**From:** Brandon Saunier <Brandon.Saunier@la.gov>

**Sent:** Thursday, April 21, 2022 9:56 PM

**To:** Cory Lormand <Cory.Lormand@LA.GOV>; Celena Cage <Celena.Cage@LA.GOV>; Brian Tusa <Brian.Tusa@LA.GOV>

**Cc:** Brian Fontenot <Brian.Fontenot@LA.GOV>; April Wallace <April.Wallace@LA.GOV>; Jeffrey Leonick <Jeffrey.Leonick@LA.GOV>; Daniel Odem <Daniel.Odem@LA.GOV>

**Subject:** Re: EPA's Pollution Accountability Team (PAT) project

Good Evening,

SERO inspector Sophia Ong had a long day of monitoring. They were in St. James Parish all day today and made entry to three facilities.

The First facility was Occidental Chemical Corp located at 7377 Hwy 3214 in Convent, LA. There was one reading for methane peaked at 2.6 ppm, detecting 0.6 ppm of methane above background (background was 2 ppm), location was near facility's power plant/boiler area.

On their way to the 2<sup>nd</sup> facility, on Hwy 18, they detected a reading of 9,000 ppb of VOC on the levee from a vent stack located on a barge on the river. It was determined that they were at NuStar facility located at 7167 Hwy 18. NuStar facility representative explained that NuStar finished loading the barge this morning at 10 am, (prior to their arrival). The facility was not actively loading or unloading the barge at the time of site visit.

The 2<sup>nd</sup> facility they made entry at was Plains Marketing, LP – St James Terminal located at 6410 Plains Terminal Rd in St. James, LA. EPA detected a slightly elevated level of 100-200 ppb of VOC near Tank 5280, but they could not determine the source. Next, a VOC reading of 35,000 ppb (35 ppm), 200 ppb benzene, 130 ppb toluene located downwind of Tank 5210, that was out of service for tank cleaning and 10-Year API Inspection. After the exit conference, they left the site and observed a barge on the river venting to the atmosphere from two vent stacks. Readings of 42,500 ppb of VOC were detected on the levee, downwind of the barge. A Plains facility representative informed them that the barge just arrived to site, and the operator was venting the pressure prior to sampling the crude oil product.

The last facility they made entry to was Americas Styrenics (AmSty) located at 9901 Hwy 18 in St. James, LA. At the beginning of the facility tour, EPA detected elevated levels of benzene at 40 ppb, downwind of the tanks. EPA explained to the facility representative that they also detected elevated levels this past Monday, 4/18/2022, outside the fence line of AmSty, which they believed originated from their facility based on collected data. Next, they traveled to the Styrene 2 (SM2) Plant, readings of 10,000 ppb (10 ppm) of benzene were detected near the 4220 vent gas compressor pumps. EPA explained that this is the strongest reading of benzene they have ever detected. EPA stated to facility personnel that their instrument calibrates at 300 ppb benzene span gas to give background regarding the installed benzene sensor. A strong sweet benzene odor was noted at this area at the time of the site visit. It is believed that benzene was somehow mixed with the steam stream and venting at this area. EPA was concerned about human safety at this point in regards to the recorded benzene levels. The STEL for 15 minute exposure of benzene is set at 5 ppm. Three canisters were pulled in this vent gas compressor pump area within the facility. They then moved to the boilers area where reading exceeded 20 ppm methane and 200 ppb benzene; however, EPA noted they were downwind of the vent gas compressor pump area where previous readings were recorded. Emissions were observed originating from the boiler stacks with the FLIR camera. There was a moderate sulfur smell at the DAF tank, which the facility representative informed them that this tank was treated water from the facility and would be piped to the outfall. The facility implied that the sulfur smell is due to stagnant water and algae growth. In the final monitoring area within the facility EPA detected elevated levels of VOC (1500-7500 ppb), benzene (40-200 ppb), and toluene (35-100 ppb) accompanied by a moderate glue odor at the butyldinitrophenol (DNBP) inhibitor storage area. They could not make entry into this DNBP area due to needing Level 2 PPE. A canister was collected at the DNBP area.

Please be advised that EPA wishes to follow up with LDEQ regarding this site as they have major safety concerns. They also stated that they plan to make a follow-up inspection at the facility at a later date.

The GMAP team plans to spend the day at Denka tomorrow.

Thank you,

Brandon

---

**From:** Brandon Saunier  
**Sent:** Wednesday, April 20, 2022 5:11 PM  
**To:** Cory Lormand; Celena Cage; Brian Tusa

**Cc:** Brian Fontenot; April Wallace; Jeffrey Leonick  
**Subject:** Re: EPA's Pollution Accountability Team (PAT) project

Good Afternoon,

We spent the morning finishing up at Union Carbide in St. Charles Parish. At the Olefins Unit we noted a 7000 ppb VOC reading near the exchanger units. We then moved to oxides where they noted readings of 300 ppb and 400 ppb of Ethylene Oxide near the Oxides analyzer building. No detections were noted near the amines unit. We finished at Union Carbide with a visit to the Ethylene Oxide storage area where a plume was noted on the FLIR originating from the EO Mound flare. Readings peaking at 15 ppb EO were noted in the area.

We then moved back to St. John Parish where we monitored with the GMAP in and around MPLX (Formerly Pin Oak). Minor VOC readings were noted with a minor plume being noted on the fixed roof VGO Tank (Tank 110-20).

GMAP team will continue in St. John and St. James tomorrow.

---

**From:** Brandon Saunier  
**Sent:** Tuesday, April 19, 2022 7:52:01 PM  
**To:** Cory Lormand; Celena Cage; Brian Tusa  
**Cc:** Brian Fontenot; April Wallace; Jeffrey Leonick  
**Subject:** Re: EPA's Pollution Accountability Team (PAT) project

Good Evening,

We spent the entire day monitoring at Union Carbide - Dow SCO Facility in St. Charles Parish.

- Prior to entry we noted an above baseline reading of Ethylene Oxide (Approximately 2 PPB)
- Prior to entry we also noted elevated levels of VOCs along the fenceline.
- First unit visited was the Poly unit where we noted a spike of 10 PPB of Ethylene Oxide.
- After, the next monitoring site were near the facility HCD Waste Water Tanks where peak readings of 1200 PPB VOC, 30 PPB Benzene, and 18 PPB Ethylene Oxide were noted.
  - An air canister sample was taken in this location which will be ran by a lab at a later date.
- The next area was the road between the Waste Water Treatment areas and Ethylene Oxide storage area where readings of 224 PPB VOC and a max of 30 PPB Ethylene Oxide were noted.
- Readings were then taken along the base of the aeration basin levees and the basins themselves. Peak readings of 2000 PPB VOC and 22 PPB Ethylene Oxide were noted in this area.
  - An air canister sample was taken in this location which will be ran by a lab at a later date.
- Hot work permits were acquired for the Acrylics, SPU, and Poly units to bring the GMAP vehicle into the work areas.
  - Peak Readings of 3000 PPB VOC were noted in the Acrylics unit.

- No detection of monitored compounds in the SPU unit.
  - No detection of monitored compounds in the Poly unit.
- Separate inspectors from EPA Region 5 accompanied the visit and have begun their own inspection focused on the permits of the facility as we accompanied the GMAP vehicle for monitoring purposes.

The GMAP will continue in Union Carbide tomorrow to collect monitoring data near the remaining units that were not visited today including oxides, amines, hydrocarbons, energy systems, and VOPAK (Owner and operator of tank farm on Union Carbide grounds) operated tanks. Please let me know if there are any questions or concerns.

Thanks,

**Brandon Saunier**  
**Louisiana Department of Environmental Quality**  
**Bayou Lafourche Regional Office**  
**Environmental Scientist 4**  
**985-532-5079**

---

**From:** Cory Lormand  
**Sent:** Tuesday, April 19, 2022 7:54 AM  
**To:** Celena Cage; Brian Tusa  
**Cc:** Brian Fontenot; April Wallace; Jeffrey Leonick; Brandon Saunier  
**Subject:** RE: EPA's Pollution Accountability Team (PAT) project

Good morning, yesterday was a long day of monitoring into the evening in St. John the Baptist and St. James Parishes. The findings are:

- There were elevated readings of ethylene oxide at Evonik in Reserve as well as offsite in industrial areas during normal operations. There were no elevated readings in the residential areas.
- Follow-up monitoring at Evonik later in the evening (during what the facility said was the loading of the ethylene oxide tank) also resulted in elevated ethylene oxide readings on-site and off-site in industrial areas. Emissions were observed with the FLIR camera from the scrubber controlling ethylene oxide and other emissions. There were no elevated readings in the residential areas.
- Elevated VOC readings were detected at the NuStar tank farm in St. James from two crude oil tanks while on-site. Emissions were observed with the FLIR cameras.
- Elevated benzene readings were detected off-site from Americas Styrenics in St. James. There was no site entry that day.
- Summa canisters were collected at the different sites with elevated readings.
- The analysis of those canisters will be completed at a later date.
- The GMAP does not analyze the canisters.



- This GMAP monitors for benzene, toluene, ethylbenzene, and xylene (BTEX), total VOCs, methane, and ethylene oxide. There may be one or two more that I missed.

The project has been passed on to SERO through Brandon Saunier who will meet with EPA today. The GMAP will continue today in St. James and probably go back to St. John the Baptist Parish for more fence-line and residential monitoring and facility site entries.

If there are questions, please let me know.

Thank you,

Cory Lormand | Environmental Scientist Staff  
State of Louisiana  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE of ENVIRONMENTAL COMPLIANCE  
Surveillance Division · Capital Regional Office  
Phone (225) 219-3040  
Email [cory.lormand@la.gov](mailto:cory.lormand@la.gov)

---

**From:** Brian Fontenot <[Brian.Fontenot@LA.GOV](mailto:Brian.Fontenot@LA.GOV)>

**Sent:** Sunday, April 17, 2022 2:17 PM

**To:** Celena Cage <[Celena.Cage@LA.GOV](mailto:Celena.Cage@LA.GOV)>; Brian Tusa <[Brian.Tusa@LA.GOV](mailto:Brian.Tusa@LA.GOV)>

**Cc:** April Wallace <[April.Wallace@LA.GOV](mailto:April.Wallace@LA.GOV)>; Jeffrey Leonick <[Jeffrey.Leonick@LA.GOV](mailto:Jeffrey.Leonick@LA.GOV)>; Cory Lormand <[Cory.Lormand@LA.GOV](mailto:Cory.Lormand@LA.GOV)>; Brandon Saunier <[Brandon.Saunier@la.gov](mailto:Brandon.Saunier@la.gov)>

**Subject:** Re: EPA's Pollution Accountability Team (PAT) project

Cory Lormand in CRO and Brandon Saunier in SERO will coordinate the remainder of the PAT project, as I'll be out of state this week.

I've sent Cory the contact person, meeting place, and meeting time for tomorrow.

Cory & Brandon, please send Celena & Brian daily updates of the PAT's activities. Please also cc me on these updates. Thanks!

Sent from my iPhone while out of the office

On Apr 17, 2022, at 08:15, Brian Fontenot <[Brian.Fontenot@la.gov](mailto:Brian.Fontenot@la.gov)> wrote:

UPDATE:

The LDEQ Inspector will not be joining the project today. He was informed by the EPA GMAP team members that he would not be needed today.

Sent from my iPhone while out of the office

On Apr 16, 2022, at 15:37, Brian Fontenot <[Brian.Fontenot@la.gov](mailto:Brian.Fontenot@la.gov)> wrote:

The project spent today doing fence line & neighborhood surveys with the GMAP. No facility entries were made. Today's surveys focused on ethylene oxide (EO).

The GMAP recorded a 10ppb hit of EO near Evonik. A neighborhood downwind from Evonik was surveyed, with no hits noted by the GMAP.

A summa canister was sampled near East St. John Prep. with approximately a 1ppb result for EO sampled.

Tomorrow's plan is more of the same, neighborhood/fence line monitoring. The LDEQ Inspector out with the team today stated he will join them again tomorrow.  
Sent from my iPhone while out of the office

On Apr 15, 2022, at 16:10, Brian Fontenot  
<[Brian.Fontenot@la.gov](mailto:Brian.Fontenot@la.gov)> wrote:

The project spent today at the Garyville Refinery in/around the tank farm. The GMAP had hits for VOCs & BTEX. These were followed up with FLIR surveys and summa canister samples. No immediately evident areas were noted.

It appears the ASPECT plane will not be used for this project.

Sent from my iPhone while out of the office

On Apr 14, 2022, at 16:00, Brian Fontenot <[Brian.Fontenot@la.gov](mailto:Brian.Fontenot@la.gov)> wrote:

Today was the final day of the project in Calcasieu. The team visited Axial/Westlake North where one hit of methane was noted with the FLIR camera near fuel gas lines.

The team also visited Citgo Refinery. Multiple hits with the FLIR, GMAP, & PID we're noted. As has been the case, no immediately evident areas were noted.

The ASPECT plane did not fly for this project today.

The project is moving to St. James Parish tomorrow.  
Sent from my iPhone while out of the office

On Apr 13, 2022, at  
18:39, Brian Fontenot  
<[Brian.Fontenot@la.gov](mailto:Brian.Fontenot@la.gov)>  
wrote:

The project was in  
Lotte/LACC (Lotte)  
in the morning then  
Westlake  
South/Axial/Eagle  
US 2 (Eagle) later  
today. Some VOC,  
benzene, and EO hits  
were noted in/around  
Lotte with sources  
pointed out to the  
facility.

The Eagle effort  
found VOC issues  
near natural gas fuel  
pipelines. These were  
pouted out to the  
facility.

As was the case over  
the last couple days of  
this project, no  
immediately evident  
areas were noted by  
the team.

While traveling from  
Lotte to Eagle, a  
neighborhood  
between the two was  
surveyed with the  
GMAP van. This  
resulted in a hit of 25  
ppb of EO. The EPA  
personnel were  
concerned by this.  
This neighborhood is  
located near the City  
Services industrial  
area in Westlake:  
Citgo Refinery,  
Westlake, &  
Indorama are some  
facilities in this area.

The ASPECT plane  
was not used for this  
project today due to  
weather.

The EPA PAT  
members are  
anticipating moving  
on to begin the next  
Parish on Friday. I  
will contact EPA  
tomorrow to confirm  
which Parish that is.  
Sent from my iPhone  
while out of the office

On  
Apr  
12,  
2022,  
at  
16:29,  
Brian  
Fonten  
ot  
<[Brian  
.Fonte  
not@la  
.gov](mailto:Brian.Fontenot@la.gov)>  
wrote:

The  
PAT  
project  
was at  
Phillip  
s 66  
today.  
A few  
hits  
were  
noted  
with  
the  
FLIR  
&  
GMAP  
in the  
facility  
.  
Summ

a  
sample  
s were  
also  
taken  
near a  
tank  
contain  
ing  
kerosene.  
Again,  
no  
immediately  
evident  
issues  
were  
noted  
by the  
Team.  
The  
ASPECT  
plane  
remained  
grounded  
for  
this  
project  
due to  
the  
weather.

According  
to  
the  
EPA  
lead  
inspector,  
there  
are still  
about 5  
facilities they  
want to  
target  
in  
Calcasieu

cu.  
They  
may  
run out  
of time  
to get  
to  
them  
all and  
still be  
able to  
move  
the  
project  
to  
CRO  
&  
SERO.

Sent  
from  
my  
iPhone  
while  
out of  
the  
office

O  
n  
A  
p  
r  
1  
1  
,  
2  
0  
2  
2  
,  
a  
t  
1  
9  
:  
1  
6  
,  
B  
r

i  
a  
n  
F  
o  
n  
t  
e  
n  
o  
t  
<  
B  
r  
i  
a  
n  
:  
F  
o  
n  
r  
e  
n  
o  
t  
@  
I  
a  
:  
g  
o  
v  
>  
w  
r  
o  
t  
e  
:  
  
T  
h  
e  
S  
u  
b  
j  
e  
c  
t

p  
r  
o  
j  
e  
c  
t  
k  
i  
c  
k  
e  
d  
o  
f  
f  
t  
o  
d  
a  
y  
a  
t  
a  
b  
o  
u  
t  
n  
o  
o  
n  
i  
n  
C  
a  
l  
c  
a  
s  
i  
e  
u  
P  
a  
r  
i  
s  
h  
(  
S  
W



R  
O  
)  
. A  
l  
l  
o  
f  
t  
o  
d  
a  
y,  
,  
s  
e  
f  
f  
o  
r  
t  
w  
a  
s  
s  
p  
e  
n  
t  
a  
r  
o  
u  
n  
d  
/  
i  
n  
S  
a  
s  
o  
l  
&  
t  
h  
e  
L  
y  
o  
n

d  
e  
l  
l  
J  
o  
i  
n  
t  
V  
e  
n  
t  
u  
r  
e  
.  
T  
h  
e  
G  
M  
A  
P  
s  
w  
e  
r  
e  
u  
s  
e  
d  
b  
o  
t  
h  
o  
u  
t  
s  
i  
d  
e  
&  
i  
n  
s  
i  
d  
e  
t

h  
e  
f  
a  
c  
i  
l  
i  
t  
y  
.  
T  
h  
e  
P  
A  
T  
a  
l  
s  
o  
u  
s  
e  
d  
o  
p  
t  
i  
c  
a  
l  
g  
a  
s  
i  
m  
a  
g  
i  
n  
g  
c  
a  
m  
e  
r  
a  
s  
(  
O  
G

I  
C  
/  
F  
L  
I  
R  
)  
&  
P  
I  
D  
s  
i  
n  
s  
i  
d  
e  
t  
h  
e  
f  
a  
c  
i  
l  
i  
t  
i  
e  
s  
.  
S  
o  
m  
e  
S  
u  
m  
m  
a  
c  
a  
n  
i  
s  
t  
e  
r  
s  
a

m  
p  
l  
e  
s  
w  
e  
r  
e  
a  
l  
s  
o  
t  
a  
k  
e  
n  
.  
N  
o  
i  
m  
m  
e  
d  
i  
a  
t  
e  
l  
y  
e  
v  
i  
d  
e  
n  
t  
i  
s  
s  
u  
e  
s  
w  
e  
r  
e  
n  
o  
t

e  
d  
,  
b  
u  
t  
t  
h  
e  
E  
P  
A  
p  
e  
r  
s  
o  
n  
n  
e  
l  
w  
i  
l  
l  
f  
o  
l  
l  
o  
w  
u  
p  
s  
o  
m  
e  
f  
i  
e  
l  
d  
f  
i  
n  
d  
i  
n  
g  
s  
a  
t

a  
l  
a  
t  
e  
r  
d  
a  
t  
e  
.  
T  
h  
e  
A  
S  
P  
E  
C  
T  
p  
l  
a  
n  
e  
w  
a  
s  
n  
o  
t  
d  
e  
p  
l  
o  
y  
e  
d  
t  
o  
d  
a  
y  
d  
u  
e  
t  
o  
w  
e  
a

t  
h  
e  
r  
c  
o  
n  
d  
i  
t  
i  
o  
n  
s  
.

A  
s  
o  
f  
t  
h  
i  
s  
e  
v  
e  
n  
i  
n  
g  
,  
t  
h  
e  
P  
r  
o  
j  
e  
c  
t  
w  
i  
l  
l  
c  
o  
n  
t  
i



n  
u  
e  
t  
h  
r  
o  
u  
g  
h  
T  
h  
u  
r  
s  
d  
a  
y  
i  
n  
C  
a  
l  
c  
a  
s  
i  
e  
u  
b  
e  
f  
o  
r  
e  
m  
o  
v  
i  
n  
g  
o  
n  
t  
o  
t  
h  
e  
C  
R  
O  
&

S  
E  
R  
O  
a  
r  
e  
a  
s  
.  
T  
h  
i  
s  
i  
s  
d  
e  
p  
e  
n  
d  
e  
n  
t  
o  
n  
w  
e  
a  
t  
h  
e  
r  
c  
o  
n  
d  
i  
t  
i  
o  
n  
s  
o  
v  
e  
r  
t  
h  
e  
n

e  
x  
t  
f  
e  
w  
d  
a  
y  
s  
.

B  
r  
i  
a  
n  
S  
e  
n  
t  
f  
r  
o  
m  
m  
y  
i  
P  
h  
o  
n  
e  
w  
h  
i  
l  
e  
o  
u  
t  
o  
f  
t  
h  
e  
o  
f  
f  
i

c  
e

Message

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFCE94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 7/18/2022 12:13:28 PM  
**To:** Kudla, Courtney [kudla.courtney@epa.gov]  
**Subject:** RE: PAT Inspections  
**Attachments:** PAT inspection reporting .xlsx

Hi Courtney,

Below are the PAT inspections (also attached). There is a separate J2J inspection for Sasol/LIP that is not a PAT inspection. The Sasol/LIP inspection is late, but there are a few circumstances (it is an NIEC consult, it required 2 separate on site inspections, and finally, there are 2 inspection reports since the Portion of Sasol that is of interest required an inspection of a separate but co-located facility, LIP. Let me know if you have any questions or if I can add info that will help.

Rpt ICIS  
 Spreadsheet?

|     | Date<br>Signed/Comp | Date Sent<br>to Facility | lead<br>inspector                                                     |                                                                                                 |                            |                 |
|-----|---------------------|--------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------|-----------------|
|     |                     |                          | R6 Americas<br>Styrenics -<br>St James<br>Plant                       | Sarah Frey<br>James<br>Haynes<br>Ben<br>Rosenthal                                               |                            |                 |
| Yes | 7/15/2022           | 7/15/2022                | R6 Ergon                                                              |                                                                                                 |                            |                 |
|     | 7/17/2022           | 7/18/2022                | R6 Sasol                                                              |                                                                                                 |                            |                 |
|     | 7/17/2022           | 7/18/2022                | R6 Phillips<br>66 Lake<br>Charles<br>R6 Westlake<br>Styrene<br>Marine | Ben<br>Rosenthal<br>Ben<br>Rosenthal?<br>Chris<br>Williams/James<br>Haynes<br>Chris<br>Williams | <b>Last Day<br/>of PAT</b> | <b>Day 60</b>   |
|     | 7/17/2022           | 7/18/2022                | AED/R6<br>Evonik                                                      |                                                                                                 | <b>4/23/2022</b>           | <b>7/2/2022</b> |
|     | 7/17/2022           | 7/18/2022                | AED NuStar                                                            |                                                                                                 | <b>6/22/2022</b>           |                 |
| Yes | 7/15/2022           | 7/15/2022                | R6 MPLX<br>(Pin Oaks)                                                 | Sarah Frey                                                                                      |                            |                 |
| Yes | 7/15/2022           | 7/15/2022                | R6 Plains<br>Marketing                                                | Sarah Frey                                                                                      |                            |                 |
| Yes | 7/15/2022           | 7/15/2022                | R6 Nucor                                                              | Sarah Frey                                                                                      |                            |                 |
|     | pending<br>report   | pending<br>report        | R6<br>OxyChem                                                         | Sarah Frey                                                                                      |                            |                 |
| Yes | 7/8/2022            | 7/8/2022                 | AED Lotte<br>AED Eagle                                                | Nick Bobbs                                                                                      |                            |                 |
| Yes | 7/8/2022            | 7/8/2022                 | US 2                                                                  | Nick Bobbs                                                                                      |                            |                 |
| Yes | 7/8/2022            | 7/8/2022                 | AED Axiall                                                            | Nick Bobbs                                                                                      |                            |                 |

|     |           |           |                                                                       |                          |
|-----|-----------|-----------|-----------------------------------------------------------------------|--------------------------|
| Yes | 6/9/2022  | 6/10/2022 | R5 Americas<br>Styrenics -<br>St James<br>Plant                       | Jason<br>Schenandoah     |
| Yes | 5/24/2022 | 6/10/2022 | R5<br>Occidental<br>Chemical<br>Corp<br>(OxyChem<br>Convent)          | Jason<br>Schenandoah     |
| Yes | 5/23/2022 | 6/13/2022 | R5 Dupont<br>Pontchartrain<br>Site<br>(Diamines)                      | Constantinos<br>Loukeris |
| Yes | 6/3/2022  | 6/13/2022 | R5 Marathon<br>Petroleum -<br>Garyville<br>Refinery                   | Constantinos<br>Loukeris |
| Yes | 5/17/2022 | 7/8/2022  | R5 Atlantic<br>Alumina<br>Company<br>(formerly<br>Noranda<br>Alumina) | Karina Kuc               |
| Yes | 5/16/2022 | 7/8/2022  | R5<br>Dow/Union<br>Carbide                                            | Victoria<br>Nelson       |
| Yes | 5/16/2022 | 7/8/2022  | R5 Vopak<br>St. Charles                                               | Victoria<br>Nelson       |
| Yes | 5/17/2022 | 7/8/2022  | R5 Pinnacle<br>Polymer                                                | Karina Kuc               |
| Yes | 5/17/2022 | 7/8/2022  | R5 Koch<br>Methanol                                                   | Karina Kuc               |

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Kudla, Courtney <kudla.courtney@epa.gov>  
**Sent:** Thursday, July 14, 2022 2:06 PM  
**To:** Leathers, James <Leathers.James@epa.gov>  
**Subject:** RE: PAT Inspections

James,

Could I get some 'quick' stats on the PAT inspections?

I am seeing 20 inspections below, but not sure that number is correct.

I want to highlight, the number of inspections completed (with the dates), what the 60 day report due date was, and then I will confirm how many met that deadline.

If you have some of this information in a recent briefing sheet, I would be happy to review and it pull it out.

Thanks,  
Courtney

---

**From:** Leathers, James <Leathers.James@epa.gov>  
**Sent:** Thursday, June 30, 2022 7:46 AM  
**To:** Kudla, Courtney <kudla.courtney@epa.gov>  
**Subject:** RE: PAT Inspections

Thanks Courtney,

There are a few remaining inspections that need to be completed (only R6 reports are pending). I do have a icis tracking document that Sarah (on detail still) and Ben Donaldson are helping will. I will get all that info into the ICIS tracking sheet by COB tomorrow. Will that work?

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Kudla, Courtney <kudla.courtney@epa.gov>  
**Sent:** Thursday, June 30, 2022 7:37 AM  
**To:** Leathers, James <Leathers.James@epa.gov>  
**Subject:** PAT Inspections

Good morning James,

In running the timeliness report for inspection reporting, I am seeing that we have 42 listed inspections in the Louisiana/PAT area that do not have report completion dates. I am assuming that we are still working on the reports

and they have not been completed? If they have been completed we do need to get the dates into ICIS. Let me know if/when you need assistance.

Thanks,  
Courtney

| Region Code | Compliance Monitoring Activity ID | Compliance Monitoring Activity Name                                                          | Facility Site Name                                                               | State Code | State/Federal Inspection | Stack Test Observed By | Compliance Monitoring Activity Type | Compliance Monitoring Type | Federal Statute Code | Le Sec (A) |
|-------------|-----------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|------------|--------------------------|------------------------|-------------------------------------|----------------------------|----------------------|------------|
| 06          | 3603232201                        | AMERICAS STYRENICS LLC - ST JAMES PLANT - PCE ECDAT                                          | AMERICAS STYRENICS LLC - ST JAMES PLANT                                          | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |
| 06          | 3603232201                        | AMERICAS STYRENICS LLC - ST JAMES PLANT - PCE ECDAT                                          | AMERICAS STYRENICS LLC - ST JAMES PLANT                                          | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |
| 06          | 3603232205                        | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY - PCE ECDAT                               | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY                               | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | CAA        |
| 06          | 3603232205                        | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY - PCE ECDAT                               | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY                               | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | CAA        |
| 06          | 3603232205                        | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY - PCE ECDAT                               | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY                               | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |
| 06          | 3603232205                        | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY - PCE ECDAT                               | OCCIDENTAL CHEMICAL CORPORATION - CONVENT FACILITY                               | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |
| 06          | 3603232329                        | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY - PCE ECDAT | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C PAR      |
| 06          | 3603232329                        | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY - PCE ECDAT | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C PAR      |
| 06          | 3603232329                        | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY - PCE ECDAT | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |
| 06          | 3603232329                        | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY - PCE ECDAT | MARATHON PETROLEUM COMPANY LP - LOUISIANA REFINING DIVISION - GARYVILLE REFINERY | LA         | E                        |                        | Inspection/Evaluation               | PCE On-Site                | CAA                  | C TIT      |



|    |            |                                                                                                                   |                                                                                                    |    |   |  |                       |             |     |           |
|----|------------|-------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|----|---|--|-----------------------|-------------|-----|-----------|
|    |            | REFINING<br>DIVISION -<br>GARYVILLE<br>REFINERY - PCE<br>ECDAT                                                    | REFINING<br>DIVISION -<br>GARYVILLE<br>REFINERY                                                    |    |   |  |                       |             |     |           |
| 06 | 3603232369 | GRAMERCY<br>HOLDINGS I LLC -<br>NORANDA<br>ALUMINA - PCE<br>ECDAT                                                 | GRAMERCY<br>HOLDINGS I LLC -<br>NORANDA<br>ALUMINA                                                 | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232369 | GRAMERCY<br>HOLDINGS I LLC -<br>NORANDA<br>ALUMINA - PCE<br>ECDAT                                                 | GRAMERCY<br>HOLDINGS I LLC -<br>NORANDA<br>ALUMINA                                                 | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232374 | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT -<br>PCE ECDAT                                                        | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT                                                        | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>PAR |
| 06 | 3603232374 | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT -<br>PCE ECDAT                                                        | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT                                                        | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>PAR |
| 06 | 3603232374 | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT -<br>PCE ECDAT                                                        | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT                                                        | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232374 | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT -<br>PCE ECDAT                                                        | UNION CARBIDE<br>CORP - ST<br>CHARLES PLANT                                                        | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232409 | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA - PCE<br>ECDAT | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>PAR |
| 06 | 3603232409 | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA - PCE<br>ECDAT | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>PAR |
| 06 | 3603232409 | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA - PCE<br>ECDAT | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232409 | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA - PCE<br>ECDAT | VOPAK<br>INDUSTRIAL<br>INFRASTRUCTURE<br>AMERICAS ST<br>CHARLES LLC -<br>VOPAK TERMINAL<br>ST. CHA | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232436 | KOCH METHANOL<br>ST JAMES - PCE<br>ECDAT                                                                          | KOCH METHANOL<br>ST JAMES                                                                          | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232436 | KOCH METHANOL<br>ST JAMES - PCE<br>ECDAT                                                                          | KOCH METHANOL<br>ST JAMES                                                                          | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232457 | PHILLIPS 66 CO -<br>LAKE CHARLES<br>REFINERY- PCE<br>ECDAT                                                        | PHILLIPS 66 CO -<br>LAKE CHARLES<br>REFINERY                                                       | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232458 | SASOL<br>CHEMICALS (USA)<br>LLC - LAKE<br>CHARLES<br>CHEMICAL<br>COMPLEX - PCE<br>ECDAT                           | SASOL<br>CHEMICALS (USA)<br>LLC - LAKE<br>CHARLES<br>CHEMICAL<br>COMPLEX                           | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232502 | SASOL<br>CHEMICALS (USA)<br>LLC - LAKE<br>CHARLES<br>CHEMICAL                                                     | SASOL<br>CHEMICALS (USA)<br>LLC - LAKE<br>CHARLES<br>CHEMICAL<br>COMPLEX                           | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |

|    |            |                                                                                   |                                                                       |    |   |  |                       |             |     |           |
|----|------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------|----|---|--|-----------------------|-------------|-----|-----------|
|    |            | COMPLEX - PCE<br>ECDAT                                                            |                                                                       |    |   |  |                       |             |     |           |
| 06 | 3603232514 | WESTLAKE<br>STYRENE LLC -<br>MARINE<br>TERMINAL - PCE<br>ECDAT                    | WESTLAKE<br>STYRENE LLC -<br>MARINE<br>TERMINAL                       | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232546 | LOTTE CHEMICAL<br>LOUISIANA LLC -<br>PCE ECDAT                                    | LOTTE CHEMICAL<br>LOUISIANA LLC                                       | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232546 | LOTTE CHEMICAL<br>LOUISIANA LLC -<br>PCE ECDAT                                    | LOTTE CHEMICAL<br>LOUISIANA LLC                                       | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232550 | EAGLE US 2 LLC -<br>LAKE CHARLES<br>COMPLEX - PCE<br>ECDAT                        | EAGLE US 2 LLC -<br>LAKE CHARLES<br>COMPLEX                           | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232550 | EAGLE US 2 LLC -<br>LAKE CHARLES<br>COMPLEX - PCE<br>ECDAT                        | EAGLE US 2 LLC -<br>LAKE CHARLES<br>COMPLEX                           | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232551 | AXIALL, LLC -<br>LAKE CHARLES<br>NORTH - PCE<br>ECDAT                             | AXIALL, LLC -<br>LAKE CHARLES<br>NORTH                                | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232551 | AXIALL, LLC -<br>LAKE CHARLES<br>NORTH - PCE<br>ECDAT                             | AXIALL, LLC -<br>LAKE CHARLES<br>NORTH                                | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232553 | EVONIK CORP -<br>RESERVE PLANT -<br>PCE ECDAT                                     | EVONIK CORP -<br>RESERVE PLANT                                        | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CAA       |
| 06 | 3603232575 | ERGON ST JAMES<br>INC - VACHERIE<br>PLANT - PCE<br>ECDAT                          | ERGON ST JAMES<br>INC - VACHERIE<br>PLANT                             | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CAA       |
| 06 | 3603232575 | ERGON ST JAMES<br>INC - VACHERIE<br>PLANT - PCE<br>ECDAT                          | ERGON ST JAMES<br>INC - VACHERIE<br>PLANT                             | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CAA       |
| 06 | 3603232623 | NUSTAR<br>LOGISTICS LP - ST<br>JAMES TERMINAL -<br>PCE ECDAT                      | NUSTAR<br>LOGISTICS LP - ST<br>JAMES TERMINAL                         | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232852 | MT AIRY<br>TERMINAL LLC -<br>MT AIRY<br>TERMINAL - PCE<br>ECDAT                   | MT AIRY<br>TERMINAL LLC -<br>MT AIRY<br>TERMINAL                      | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603232894 | PLAINS<br>MARKETING LP -<br>ST JAMES<br>TERMINAL - PCE<br>ECDAT                   | PLAINS<br>MARKETING LP -<br>ST JAMES<br>TERMINAL                      | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603243204 | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE - PCE ECDAT | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CAA       |
| 06 | 3603243204 | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE - PCE ECDAT | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CAA       |
| 06 | 3603243204 | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE - PCE ECDAT | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |
| 06 | 3603243204 | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE - PCE ECDAT | DUPONT<br>SPECIALTY<br>PRODUCTS USA<br>LLC -<br>PONTCHARTRAIN<br>SITE | LA | E |  | Inspection/Evaluation | PCE On-Site | CAA | CA<br>TIT |

\*\*\*\*\*

Courtney Kudla (she/her - Why is this important?)  
Enforcement Coordinator  
Enforcement and Compliance Assurance Division  
Region 6 - Dallas, TX  
(w) 214-665-8008  
(c) 469-704-1593

Rpt ICIS Spreadsheet?

|     | Date Signed/Comp | Date Sent to Facility |
|-----|------------------|-----------------------|
| Yes | 7/15/2022        | 7/15/2022             |
|     | 7/17/2022        | 7/18/2022             |
|     | 7/17/2022        | 7/18/2022             |
|     | 7/17/2022        | 7/18/2022             |
|     | 7/17/2022        | 7/18/2022             |
|     | 7/17/2022        | 7/18/2022             |
| Yes | 7/15/2022        | 7/15/2022             |
| Yes | 7/15/2022        | 7/15/2022             |
| Yes | 7/15/2022        | 7/15/2022             |
| Yes | 7/15/2022        | 7/15/2022             |
|     | pending report   | pending report        |
| Yes | 7/8/2022         | 7/8/2022              |
| Yes | 7/8/2022         | 7/8/2022              |
| Yes | 7/8/2022         | 7/8/2022              |
| Yes | 6/9/2022         | 6/10/2022             |
| Yes | 5/24/2022        | 6/10/2022             |
| Yes | 5/23/2022        | 6/13/2022             |
| Yes | 6/3/2022         | 6/13/2022             |
| Yes | 5/17/2022        | 7/8/2022              |
| Yes | 5/16/2022        | 7/8/2022              |
| Yes | 5/16/2022        | 7/8/2022              |
| Yes | 5/17/2022        | 7/8/2022              |
| Yes | 5/17/2022        | 7/8/2022              |

|                                                        |                             |
|--------------------------------------------------------|-----------------------------|
| R6 Americas Styrenics - St James Plant                 | lead inspector              |
| R6 Ergon                                               | Sarah Frey                  |
| R6 Sasol                                               | James Haynes                |
| R6 Phillips 66 Lake Charles                            | Ben Rosenthal               |
| R6 Westlake Styrene Marine                             | Ben Rosenthal               |
| AED/R6 Evonik                                          | Ben Rosenthal?              |
| AED NuStar                                             | Chris Williams/James Haynes |
| R6 MPLX (Pin Oaks)                                     | Chris Williams              |
| R6 Plains Marketing                                    | Sarah Frey                  |
| R6 Nucor                                               | Sarah Frey                  |
| R6 OxyChem                                             | Sarah Frey                  |
| AED Lotte                                              | Nick Bobbs                  |
| AED Eagle US 2                                         | Nick Bobbs                  |
| AED Axiall                                             | Nick Bobbs                  |
| R5 Americas Styrenics - St James Plant                 | Jason Schenandoah           |
| R5 Occidental Chemical Corp (OxyChem Convent)          | Jason Schenandoah           |
| R5 Dupont Pontchartrain Site (Diamines)                | Constantinos Loukeris       |
| R5 Marathon Petroleum - Garyville Refinery             | Constantinos Loukeris       |
| R5 Atlantic Alumina Company (formerly Noranda Alumina) | Karina Kuc                  |
| R5 Dow/Union Carbide                                   | Victoria Nelson             |
| R5 Vopak St. Charles                                   | Victoria Nelson             |
| R5 Pinnacle Polymer                                    | Karina Kuc                  |
| R5 Koch Methanol                                       | Karina Kuc                  |

| Last Day of PAT | Day 60    | Day 70   |
|-----------------|-----------|----------|
| 4/23/2022       | 6/22/2022 | 7/2/2022 |

Message

---

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFCE94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 1/26/2022 3:47:08 PM  
**To:** Kim, Kevin [kim.kevin@epa.gov]  
**Subject:** FW: Post Sasol to the web  
**Attachments:** SasolNOPVOC\_1-24-22\_Corrected.pdf; Axiall\_Lake Charles\_114\_2022-01-25cs.pdf

Can you also post the Axiall 114 attached. When done, please send me the links to both. Unless you have questions, no need for a phone call.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Bates, Samuel <Bates.Samuel@epa.gov>  
**Sent:** Wednesday, January 26, 2022 9:34 AM  
**To:** Kim, Kevin <kim.kevin@epa.gov>  
**Cc:** Leathers, James <Leathers.James@epa.gov>  
**Subject:** Post Sasol to the web

Kevin

Could you post the Sasol NOPVOC to the web? Thanks for your assistance in this matter. This needs to be posted today!!!

Samuel Bates, Chief  
Chemical Accident Enforcement Section (ECDAC)  
Enforcement and Compliance Assurance Division  
[bates.samuel@epa.gov](mailto:bates.samuel@epa.gov)  
(214) 665-2243 voice  
(214) 665-7447 fax

Message

**From:** Leathers, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C618FFFC94D406F9CB82B430B073FE1-LEATHERS, JAMES]  
**Sent:** 1/26/2022 5:37:38 PM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**Subject:** RE: links to actions on our Website  
**Attachments:** SasolNOPVOC\_1-24-22.pdf

It has been fixed, attached is the file and file name that will be downloaded.

James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

---

**From:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>  
**Sent:** Wednesday, January 26, 2022 11:24 AM  
**To:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Subject:** RE: links to actions on our Website

Can you let me know when Kevin has corrected the file name?

---

**From:** Leathers, James <[Leathers.James@epa.gov](mailto:Leathers.James@epa.gov)>  
**Sent:** Wednesday, January 26, 2022 10:30 AM  
**To:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>  
**Cc:** Barnett, Cheryl <[Barnett.Cheryl@epa.gov](mailto:Barnett.Cheryl@epa.gov)>; Tates, Samuel <[Tates.Samuel@epa.gov](mailto:Tates.Samuel@epa.gov)>; Larson, Darrin <[Larson.Darrin@epa.gov](mailto:Larson.Darrin@epa.gov)>  
**Subject:** Re: links to actions on our Website

FYI, Actions posted.

<https://www.epa.gov/la/enforcement-and-compliance-assurance-documents-louisiana>

|  | HQ/Region | Type        | Signed     | Subject                                                     | Program(s) | Title                                   | Facility                                          | City     | State | Published  | I |
|-------------------------------------------------------------------------------------|-----------|-------------|------------|-------------------------------------------------------------|------------|-----------------------------------------|---------------------------------------------------|----------|-------|------------|---|
|  | R06       | Enforcement | 01/25/2022 | CAA 114 Information Request                                 | Air        | Axiall LLC, Westlake, Louisiana         | Axiall, LLC - Lake Charles North                  | Westlake | LA    | 01/26/2022 |   |
|  | R06       | Enforcement | 01/24/2022 | CAA Notice of Potential Violation and Opportunity to Confer | Air        | Sasol Chemicals (USA) LLC, Westlake, LA | Sasol Chemicals (USA) LLC - Lake Charles Facility | Westlake | LA    | 01/26/2022 |   |



James Leathers  
Environmental Engineer  
EPA Region 6  
Chief, Air Toxics Enforcement Section  
Dallas, TX 75270  
(214) 665-6569  
[leathers.james@epa.gov](mailto:leathers.james@epa.gov)

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

Message

---

**From:** McDowell, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26229204C87742FCA47BF006F349DAFD-MCDOWELL, J]  
**Sent:** 11/19/2021 9:58:11 PM  
**To:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]; Cole, Howard [Cole.Howard@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

I am in agreement with Howard!

Are you having a conference call with the facility next week?

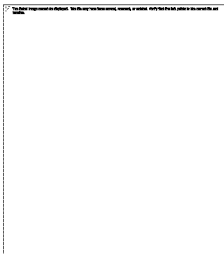
---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Friday, November 19, 2021 10:19 AM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good morning Howard,  
Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <Cole.Howard@epa.gov>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued." This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

(a) The owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.

(b) The procedures shall assure that the following considerations are addressed prior to any change:

- (1) The technical basis for the proposed change;
- (2) Impact of change on safety and health;
- (3) Modifications to operating procedures;
- (4) Necessary time period for the change; and,
- (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>

**Sent:** Wednesday, November 17, 2021 2:24 PM

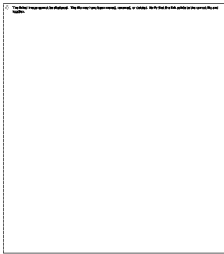
**To:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>; Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>

**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I've never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary "repair" does not mean a temporary "change" to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn't need to be issued. I'm finding guidance from online sources that are not industry codes/standards, but I think I'm going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**

Environmental Scientist III

Office of Environmental Compliance

Chemical Accident Prevention Program

602 N. Fifth St., Baton Rouge, LA 70802

(225) 219-3627

Message

---

**From:** McDowell, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26229204C87742FCA47BF006F349DAFD-MCDOWELL, J]  
**Sent:** 12/9/2021 11:55:10 PM  
**To:** Bates, Samuel [Tates.Samuel@epa.gov]  
**CC:** Murdock, Russell [Murdock.Russell@epa.gov]  
**Subject:** Sasol VPCE - Attorney Request  
**Attachments:** Sasol VPCE Report\_final.pdf; Proof Chart SASOL VPCE.docx

## Justin McDowell

Environmental Life Scientist  
U.S. Environmental Protection Agency  
Region 6 (MC: ECDAC)  
1201 Elm Street, Suite 500  
Dallas, Texas 75270-2102

(214) 665-6557 (desk) (214) 665-3177 (fax)  
[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)



**Confidentiality Warning:**

*This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.*

## Region 6 - Enforcement & Compliance Assurance Division

### Virtual Partial Compliance Evaluation Findings

|                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                    |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Inspection Date(s):                    | January 26, 2021 – July 19, 2021                                                                                                                                                                                                                                                                                                                                                                                                                          |                                    |
| Media Program:                         | Air                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                    |
| Regulatory Program(s)                  | Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions – Risk Management Program (RMP)                                                                                                                                                                                                                                                                                                                                |                                    |
| Company Name:                          | <b>Sasol Chemicals USA LLC</b>                                                                                                                                                                                                                                                                                                                                                                                                                            |                                    |
| Facility Name:                         | <b>Sasol Chemicals USA LLC</b>                                                                                                                                                                                                                                                                                                                                                                                                                            |                                    |
| Facility Physical Location:            | 2201 Old Spanish Trail                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                    |
| (city, state, zip code)                | Westlake, Louisiana 70669                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                    |
| Mailing address:                       | 2201 Old Spanish Trail                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                    |
| (city, state, zip code)                | Westlake, Louisiana 70669                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                    |
| County/Parish:                         | Calcasieu                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                    |
| Facility Phone Number                  | (337) 494-5450                                                                                                                                                                                                                                                                                                                                                                                                                                            | Operator Phone                     |
| Facility Contact:                      | Michael McCarble                                                                                                                                                                                                                                                                                                                                                                                                                                          | Senior Manager Process Safety      |
|                                        | <a href="mailto:Michael.mccarble@us.sasol.com">Michael.mccarble@us.sasol.com</a>                                                                                                                                                                                                                                                                                                                                                                          |                                    |
| FRS Number:                            | 110017418061                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                    |
| Media Identifier Number:               | 1000 0009 9886 (EPA Facility Identifier)                                                                                                                                                                                                                                                                                                                                                                                                                  |                                    |
| NAICS:                                 | 32511 Petrochemical Manufacturing                                                                                                                                                                                                                                                                                                                                                                                                                         |                                    |
| SIC:                                   | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                    |
| Personnel participating in inspection: |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                    |
| Justin McDowell                        | US EPA                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Inspector                          |
| Howard Cole                            | US EPA                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Inspector                          |
| Bryn Ray                               | LDEQ                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Inspector                          |
| Keri Meyers                            | LDEQ                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Inspector                          |
| Jamie Vicknair                         | LDEQ                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Inspector                          |
| Glen Jenkins                           | LDEQ                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Inspector                          |
| Pieter Potgieter                       | Sasol                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RMP Responsible Official           |
| Michael McCarble                       | Sasol                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Senior Manager Process Safety      |
| Scott Tyler                            | Sasol                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Senior Manager Safety and Security |
| Bruce Hubbard                          | Sasol                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Staff                              |
| Heather Kress                          | Sasol                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Legal                              |
| EPA Lead Inspector<br>Signature/Date   | <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">McDowell, Justin</h1> <p>Justin McDowell</p> </div> <div style="font-size: 0.8em;"> <p>Digitally signed by McDowell, Justin<br/> DN: cn=McDowell, Justin, email=McDowell.Justin@epa.gov<br/> Date: 2021.09.02 09:52:51 -05'00'</p> </div> </div>                                                               |                                    |
| Supervisor<br>Signature/Date           | <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">SAMUEL TATES</h1> <p>Samuel Tates</p> </div> <div style="font-size: 0.8em;"> <p>Digitally signed by SAMUEL TATES<br/> DN: c=US, o=U.S. Government, ou=Environmental Protection Agency,<br/> cn=SAMUEL TATES, 0.9.2342.19200300.100.1.1=68001003655433<br/> Date: 2021.09.15 16:26:45 -05'00'</p> </div> </div> |                                    |

## **Section I – INTRODUCTION**

### **PURPOSE OF THE INSPECTION**

On January 19, 2021, the United States Environmental Protection Agency (EPA) Region 6 sent an email to facility personnel at the Sasol Chemicals USA LLC plant (Sasol), located in Westlake, Louisiana, to announce the initiation of a Clean Air Act Risk Management Plan (RMP) Virtual Partial Compliance Evaluation (VPCE). The e-mail informed Sasol personnel of the start of the VPCE which included a Microsoft Teams video opening conference scheduled on January 26, 2021. During the opening conference, Region 6 inspectors Howard Cole and Justin McDowell and the Louisiana Department of Environmental Quality (LDEQ) Chemical Accident Prevention Program inspectors Bryn Ray, Keri Meyers, Jamie Vicknair and Glen Jenkins met with Pieter Potgieter, Michael McCarble, Scott Tyler, Bruce Hubbard and Heather Kress. I presented my credentials and informed Sasol personnel that this was an EPA inspection to determine compliance with the federal Chemical Accident Prevention Program. The scope of the VPCE was to evaluate the facility's compliance with the Clean Air Act (CAA) Section 112(r) and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68 as well as the General Duty Clause. EPA inspectors discussed general VPCE procedural questions, confidential business information (CBI) procedures, interview schedules, the proposed timeline and the exit conference and final report. This VPCE is a new compliance monitoring tool that EPA Region 6 is utilizing during the COVID-19 Public Health Emergency. This evaluation included reviewing and obtaining copies of documents and records and conducting interviews and taking of statements via video conference.

### **FACILITY DESCRIPTION**

According to the facility, Sasol's Lake Charles Chemical Complex (Sasol) uses natural gas and by-products from refinery operations to produce specialty chemicals for detergents and cosmetics. The chemical complex uses or produces several regulated flammables such as ethylene, propane, butane, propylene, ethane, butane, hydrogen, methane, and pentane. Regulated chemicals include Chlorine, Ethylene Oxide and Hydrogen Fluoride. As such, the Sasol facility is classified as a Program 3 RMP facility. Sasol employs 1,258 full-time employees.

## **Section II – OBSERVATIONS**

N/A

**Closing Meeting** – EPA convened a closing meeting on July 19, 2021, to discuss the Areas of Concern (AOC) noted during the VPCE, the inspection report completion process, and answer questions from Sasol personnel.

### Section III – AREAS OF CONCERN (AOC)

#### AOC 1 – 40 C.F.R §68.67 (e) Process Hazard Analysis

“(e) The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.”

Sasol did not assure that 19 recommendations of the 2016 PHA were resolved in a timely manner and the actions were completed as soon as possible. The 19 recommendations from the 2016 PHA had not been completed as of February 2021.

---

#### AOC 2 – 40 C.F.R §68.73 (b) Mechanical Integrity

“(b) *Written procedures.* The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.”

Sasol failed to implement written procedures to maintain the on-going integrity of the following process equipment:

1. Mixing Tees
  2. Injection Points
  3. Dead Leg Inspections
  4. CUI Inspection
  5. Soil/air interface
- 

#### AOC 3 – 40 C.F.R §68.73 (d)(1) Mechanical Integrity

“(d) *Inspection and testing.* (1) Inspections and tests shall be performed on process equipment.”

##### Alcohol Unit:

- External visual inspection records were not provided for circuit 6-HM-073.3-684-N-A2-1. During the virtual meeting on 6/17/2021, Sasol Chemical Inspection Manager stated that he was not sure if a previous record existed for that circuit. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> Alcohol>300-100.docx]
- Thickness examinations have not been taken for lines 1"-XP-073.3-1379-N-A2-5 and ¾"-XP-073.3-1376-N-E2 since they were put into service. During the meeting on 6/17/2021, Sasol staff stated that they assume the piping installation date for these circuits were at the time the unit was built, which was sometime between 1965-1969. Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which sets thickness examinations of Class 1 piping to a maximum of every five (5) years. These lines are classified as Class 1 small bore piping, which “shall be inspected in accordance with all the requirements of this document” per API 570



section 6.6.1. The class of piping for these circuits was confirmed by Sasol staff during the meeting on 6/17/2021. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> Alcohol>ALC UPIPE.docx]

ETO Unit:

- Thickness examinations have not been taken for circuits 10"-HM-075-93-P-A16-3 1 and 1"IN-075-1142-N-A13-11 since they were put into service. During the meeting on 6/17/2021, Sasol MI staff stated that they assume the piping installation date for these circuits were at the time the unit was built, which was around the mid 1960's. Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which sets thickness examinations of Class 1 piping to a maximum of every five (5) years. These lines are classified as Class 1 small bore piping, which "shall be inspected in accordance with all the requirements of this document" per API 570 section 6.6.1. The class of piping for these circuits was confirmed by Sasol MI staff during the meeting on 6/17/2021. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> ETO>ETO UPIPE.docx]
- External visual inspection records were not provided for circuit 4"-HM-075-64-S-A16-3. During the virtual meeting on 6/17/2021, Sasol Chemical Inspection Manager stated that he was not sure if a previous record existed for that circuit. This class 2 piping circuit has gone without an external visual inspection since its time of installation, which was around the mid 1960's when the unit was built. API 570 *Piping Inspection Code* – fourth edition sets external visual inspections of Class 2 piping to a maximum of every five (5) years. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> ETO]

---

**AOC 4 – 40 C.F.R §68.73 (d)(2) Mechanical Integrity**

"(d) *Inspection and testing.* (2) Inspection and testing procedures shall follow recognized and generally accepted good engineering practices."

-failed to perform external piping inspections on Class 1 and Class 2 piping at 5-year intervals in the Alcohol and ETO units as required by API 570.

-failed to complete all CUI and Soil-Interface for pressure vessels such as but not limited to FB-613A in the Alcohol Unit in accordance with API 510.

-failed to perform internal inspections of pressure vessels such as but not limited to T6-677-FB-613A, T6-663-FB-805, D7-324-FA-410, in accordance with API 510.

---

### AOC 5 – 40 C.F.R §68.73 (d)(3) Mechanical Integrity

“(d) *Inspection and testing.* (3) The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.”

#### Alcohol Unit:

- Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which sets external visual inspections of Class 1 piping to a maximum of every five (5) years. Piping circuits 10-HM-073.3-676-N-A2-1; 12-HM-073.3-662-H-A2-1 had an external visual inspection performed on 5/29/2013, which would have set the next one to be due on or before 5/29/2018 to meet the five (5) year inspection frequency. No external visual inspection was performed in 2018. During the virtual meeting on 6/17/2021, Sasol Chemical Inspection Manager stated that they were currently in the process of getting the external visual inspection performed for 2021. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> Alcohol>300-100.docx]
- Piping circuits 1"-XP-073.3-1379-N-A2-5, ¾"-XP-073.3-1376-N-E2, and 2"-XP-073.3-1359-N-E2-1 had an external visual inspection performed on 6/3/2013, which would have set the next one to be due on or before 6/3/2018 to meet the five (5) year inspection frequency. No external visual inspection was performed in 2018. During the virtual meeting on 6/17/2021, Sasol Chemical Inspection Manager stated that they were currently in the process of getting the external visual inspection performed for 2021. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> Alcohol>300-159.docx]
- Thickness examinations for circuit 2"-XP-073.3-1359-N-E2-1 had not been taken since 4/8/2015 at the time of EPA's inspection. The next thickness examination was required to be conducted on or before 4/8/2020 to meet the five (5) year inspection frequency; however, this was not met. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> Alcohol>ALC UPIPE.docx]

Note: Thickness readings for this line have historically been late since the first reading was taken on 8/9/2005. The next thickness measurement was required to be taken on or before 8/9/2010; however, no readings were taken at that time. The UPIPE data report uploaded showed “EMPTY” under the rows for 2/15/2012, 3/17/2014, and 6/16/2014 readings. During the 6/17/2021 meeting, it was confirmed that the “EMPTY” classification meant that no reading was taken at that time. The next reading was taken on 4/8/2015, which was five (5) years late.

#### ETO Unit:

- Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which sets external visual inspections of Class 1 piping to a maximum of every five (5) years. Piping circuits 10"-HM-075-93-P-A16-3 and 1"IN-075-1142-N-A13-11 had an external visual inspection performed on 11/13/2014, which would have set the next one to be due on or before 11/13/2019 to meet the five (5) year inspection frequency. No external visual inspection was performed in 2019. During the virtual meeting on 6/17/2021, Sasol Chemical Inspection Manager stated that they were currently in the process of getting the external visual inspection performed for 2021. These circuits are class 1 small bore piping, which API 570 fourth edition section 6.6.1 requires to be inspected in accordance with all the requirements of the API 570

document. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> ETO>ETO-34.docx]

LAB Unit:

- Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which sets external thickness measurements of Class 1 piping to a maximum of every five (5) years. Piping circuit 10"-HM-811-182-P-B2-9 had thickness measurements taken on 10/1/2005, which would have set the next one to be due on or before 10/1/2005 to meet the five (5) year inspection frequency. No external visual inspection was performed in 2010. The next thickness measurement was not taken until 4/27/2016, making this circuit six (6) years late. See Table 1 below. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> LAB>10"-HM-811-182-P-B2-9>10"-HM-811-182-P-B2-9 & 6in-HM-992-H-B2-9 UpipeInfo.docx]
- Sasol's maintenance plan for pumps P72-306 and P72-307 sets a General PM and Turbine maintenance task to every six (6) months.
  - For P72-307, the 5/9/2017 6-month PM was four (4) months late and there was one 6-month PM missed during 2018. See Table 2 below.
  - For P72-306, there was one 6-month PM missed during 2016, the 12/20/2017 6-month PM was four (4) months late, and the 9/20/2018 6-month PM was three (3) months late. See Table 3 below.

**Table 1. Late thickness readings for TMLs on circuit 10"-HM-811-182-P-B2-9.**

| TML Number | Location Description | First Survey Thick Nt | First Survey Date | Previous Survey Thick Nt | Previous Survey Date | Last Survey Thick Nt | Last Survey Date |
|------------|----------------------|-----------------------|-------------------|--------------------------|----------------------|----------------------|------------------|
| 312        | 31-10" ELL           | 0.373                 | 10/1/2005         | 0.373 RR                 | 4/27/2016            | 0.376 OR             | 2/28/2018        |
| 313        | 31-10" PIPE          | 0.355                 | 10/1/2005         | 0.348 RR                 | 4/27/2016            | 0.351 E              | 2/28/2018        |
| 314        | 31-10" PIPE          | 0.347                 | 10/1/2005         | 0.338 RR                 | 4/27/2016            | 0.342 T              | 2/28/2018        |
| 315        | 31-10" PIPE          | 0.361                 | 10/1/2005         | 0.354 RR                 | 4/27/2016            | 0.353 N              | 2/28/2018        |
| 316        | 31-10" PIPE          | 0.355                 | 10/1/2005         | 0.354                    | 4/27/2016            | 0.353 N              | 2/28/2018        |
| 317        | 31-10" PIPE          | 0.355                 | 10/1/2005         | 0.353                    | 4/27/2016            | 0.353 RR             | 2/28/2018        |
| 318        | 31-10" TEE           | 0.35                  | 12/12/2013        | 0.36                     | 4/27/2016            | 0.360 S              | 2/28/2018        |
| 319        | 31-10" PIPE          | 0.339                 | 10/1/2005         | 0.342                    | 4/27/2016            | 0.340 N              | 2/28/2018        |
| 331        | 31-8" PIPE           | 0.354                 | 10/1/2005         | 0.302                    | 4/27/2016            | 0.302 B              | 2/28/2018        |
| 332        | 31-6" ELL            | 0.287                 | 10/1/2005         | 0.284                    | 4/27/2016            | 0.280 OR             | 2/28/2018        |
| 333        | 31-6" PIPE           | 0.273                 | 10/1/2005         | 0.264 RR                 | 4/27/2016            | 0.268 T              | 2/28/2018        |
| 334        | 31-6" ELL            | 0.264                 | 10/1/2005         | 0.26                     | 4/27/2016            | 0.260 OR             | 2/28/2018        |
| 335        | 31-6" PIPE           | 0.258                 | 10/1/2005         | 0.253 RR                 | 4/27/2016            | 0.260 E              | 2/28/2018        |

**Table 2. Late six-month maintenance tasks for P72-307.**

| Date of 6-month PM       | Notes          |
|--------------------------|----------------|
| 8/26/2016                |                |
| <b>5/9/2017</b>          | *4 months late |
| 11/30/2017               |                |
| <b>6/26/2018</b>         |                |
| <b>no 12/2018 record</b> | *missed 6M PM  |
| 6/28/2019                |                |
| 11/21/2019               |                |
| 5/14/2020                |                |
| 11/5/2020                |                |

**Table 3. Late six-month maintenance tasks for P72-306.**

| Date of 6-month PM      | Notes          |
|-------------------------|----------------|
| 3/3/2016                |                |
| <b>No 9/2016 record</b> | *missed PM     |
| 2/16/2017               |                |
| <b>12/20/2017</b>       | *4 months late |
| <b>9/20/2018</b>        | *3 months late |
| 3/26/2019               |                |
| 9/10/2019               |                |
| 3/12/2020               |                |
| 9/25/2020               |                |
| 3/23/2021               |                |

---

**AOC 6 – 40 C.F.R §68.73 (e) Mechanical Integrity**

“(e) *Equipment deficiencies.* The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in §68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.”

- a. Piping circuit 10"-XF-811-1322-N-B2-9X had an external visual inspection performed on 4/5/2018 in which the API 570 inspector noted a leak clamp located at VI-04 and provided written notification to remove the clamp and repair permanently. The leak clamp failed on 6/7/2019 causing a release of hydrofluoric acid (HF). This was associated with work order #950009217, which had a required start date of 4/9/2018 in the system. D. Morgan put into the comments section the following statement date stamped at 7:11:53 on 6/11/2019 – “On 11/16/2018 a visual inspection was performed on the leak clamp and there wasn’t any evidence of leakage. Therefore, the next repair or visual inspection due date will be rescheduled 1 year from today’s date 6/11/2019”. This comment was date stamped at 7:11:53 on 6/11/2019, a year and two months past the required start date in the work order and four days after the leak clamp failed. Sasol holds their in-service piping to API 570 *Piping Inspection Code* – fourth edition, which states that temporary repairs may remain in place for a longer period of time only if approved and documented by the piping engineer. This was not done until after the leak clamp failed and caused a release; therefore, the owner or operator failed to correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation. [Location: Non-Confidential Business Information> 011-Section C-MI Program> Document Request 4 > Mechanical Integrity> LAB>10"-XF-811-1322-N-B2-9X>LAB 300 HF Acid-006 Final Report.pdf]
- b. Sasol did not correct deficiencies in a timely manner by maintaining a pipe clamp (temporary repair) on a flange for more than 10 years. The pipe clamp was installed on the flange in 2010 and

was not removed and repaired until June 2021, 5 months after this RMP inspection was initiated.  
The leaking flange is located on a condensate line in the ETO Unit, operating at 366 F and 150 PSI.

---

**AOC 7 – 40 C.F.R §68.75 (a)/(b) Management of Change**

“(a) The owner or operator shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process.”

“(b) The procedures shall assure that the following considerations are addressed prior to any change: (1) The technical basis for the proposed change; (2) Impact of change on safety and health; (3) Modifications to operating procedures; (4) Necessary time period for the change.”

Sasol did not implement written procedures to manage changes to process equipment in that a management of change was not performed for the installation of a pipe clamp (Inlet 12” 300# flange, TR-2015-020), that assured that the following considerations were addressed:

- the technical basis for the proposed change;
- impact of change on safety and health;
- modifications to operating procedures;
- the time period for the change-10 years is not appropriate)

---

**AOC 8 – 40 C.F.R §68.79 (d) Compliance Audits**

“(d) The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.”

The 2016 Compliance Audit had action items past due for completion such as items #35 and #38.

The owner did not promptly document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

1. The plant emergency alarms cannot be heard in all areas of the plant (CA 12938) (alarm system upgrade in-progress). Reference #10397
  2. Mechanical Integrity: Mixing Tees (CA 12923) Reference #10366
  3. Mechanical Integrity: Injection Points (CA 12922) Reference #10366
  4. Mechanical Integrity: Dead Leg Inspections (12921) Reference #10366
  5. Mechanical Integrity: CUI Inspection (12920) Reference #10366
  6. Mechanical Integrity: Soil/air interface (12924) NDE. Reference #10366
  7. Buried Piping (12913)
  8. Pipe Trunions 12925
  9. PMI Spare Parts (12930) and Retro PMI (10386), (12931)
-

**AOC 9 – 40 C.F.R §68.81 (c) Incident Investigations**

“(c) An incident investigation team shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.”

The following investigation teams did not consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.

- a. 2/ 2/ 2020
- b. 12/27/2019
- c. 12/26/ 2019
- d. 12/20/2019
- e. 7/27/2019

---

**AOC 10 – 40 C.F.R §68.81 (d)(4) Incident Investigations**

“(d) A report shall be prepared at the conclusion of the investigation which includes at a minimum: (4) The factors that contributed to the incident;”

The following report did not include factors that contributed to the incident:

- a. 12/20/2019

---

**AOC 11 – 40 C.F.R §68.81 (d)(5) Incident Investigations**

“(d) A report shall be prepared at the conclusion of the investigation which includes at a minimum: (5) Any recommendations resulting from the investigation.”

The following investigations did not have any recommendations resulting from the investigation:

- a. 2/2/2020
- b. 12/27/2019
- c. 12/26/2019
- d. 12/20/2019
- e. 7/27/2019

---

**AOC 12 – 40 C.F.R §68.81 (f) Incident Investigations**

“(f) The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable.”

The following reports were not reviewed with all affected personnel:

- a. 2/20/2020
- b. 12/27/2019
- c. 12/26/2019
- d. 12/20/2019
- e. 11/20/2019- the joint venture may have reviewed with personnel; however, I do not have any documentation or verbal confirmation that it was reviewed.
- f. 7/27/2019

---

**AOC 13 – 40 C.F.R §68.73 (f)(1) Mechanical Integrity**

“(f) *Quality assurance.* (1) In the construction of new plants and equipment, the owner or operator shall assure that equipment as it is fabricated is suitable for the process application for which they will be used.”

- a. 1/13/2020 – Vent piping on vessel failed because bolts were under designed. The design is important because the system is operated at such a high pressure.

---

**AOC 14 – 40 C.F.R §68.73 (f)(2) Mechanical Integrity**

“(f) *Quality assurance.* (2) Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.”

- a. 12/20/2019 – XV-50272 valve bonnet leak. Result of an incorrect design for the valve as provided by a 3<sup>rd</sup> party firm. The design failure resulted in insufficient torque of the valve bonnet sealing surface bolts, which prevented the valve from retaining gas pressure.

---

**AOC 15 – 40 C.F.R §68.69 (a) Operating Procedures**

“(a) The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.”

- a. 1/11/2020 – The root cause was the procedure was not followed. The valve line-up once the nitrogen purging process is completed requires double block isolation from atmosphere. Only a single valve was closed. This single valve did not allow a tight isolation resulting in the loss of contamination. In addition, there was no single point of accountability. Inconsistency as to the way each step in the procedures in tracked and confirmed completed when multiple individuals work on different parts of the same process.
-

Message

---

**From:** McDowell, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26229204C87742FCA47BF006F349DAFD-MCDOWELL, J]  
**Sent:** 2/15/2022 2:20:15 PM  
**To:** Lundelius, Diana [Lundelius.Diana@epa.gov]  
**Subject:** RE: Request for EJ Screen assistance for Sasol USA LLC  
**Attachments:** Sasol Case Summary.docx

---

**From:** Lundelius, Diana <Lundelius.Diana@epa.gov>  
**Sent:** Monday, February 14, 2022 3:54 PM  
**To:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Request for EJ Screen assistance for Sasol USA LLC

If I can get this done tomorrow I will send, otherwise I'll definitely have it for you no later than Feb 25.  
Will there be environ benefit reductions also?  
If so, then a copy of the fact sheet would be helpful to do those calcs to get HQ approval for the amounts.  
Diana

---

**From:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Sent:** Monday, February 14, 2022 3:36 PM  
**To:** Lundelius, Diana <Lundelius.Diana@epa.gov>  
**Subject:** Request for EJ Screen assistance for Sasol USA LLC

If you could help me when you get the chance, no rush.

## Justin McDowell

Environmental Life Scientist  
U.S. Environmental Protection Agency  
Region 6 (MC: ECDAC)  
1201 Elm Street, Suite 500  
Dallas, Texas 75270-2102

(214) 665-6557 (desk) (214) 665-3177 (fax)  
[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)



**Confidentiality Warning:**

*This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.*



## EPA Region 6: Sasol Chemicals USA, LLC. Case Summary

### Prevention of Accidental Releases provisions of the Clean Air Act 112(r), 42 U.S.C. § 7412(r), and the Chemical Accident Prevention regulations, 40 C.F.R. Part 68

#### Overview

Sasol Chemicals USA, LLC. ("Sasol"), located in Westlake, Louisiana, uses natural gas and by-products from refinery operations to produce specialty chemicals for detergents and cosmetics. The chemical complex uses or produces several regulated flammables such as ethylene, propane, butane, propylene, ethane, butane, hydrogen, methane and pentane. The regulate chemicals include Chlorine, Ethylene Oxide and Hydrogen Flouride. The Sasol facility is classified as a Program 3 Risk Management Plan (RMP) facility. Sasol employs 1,258 full-time employees.

#### Background

Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) regulates facilities with regulated or other extremely hazardous substances through the Prevention of Accidental Releases provisions of the CAA found in Section 112(R), 42 U.S.C. §7412(r), and the Chemical Accident Prevention regulations at 40 C.F.R. Part 68 (commonly known as the Risk Management Plan Rule) to ensure the safety of the facility and to protect surrounding communities.

On January 19, 2021, the EPA Region 6 contacted facility personnel at Sasol to announce the initiation of a CAA RMP Virtual Partial Compliance Evaluation. The Virtual Partial Compliance Evaluation began on January 26, 2021, led by Region 6 inspectors Howard Cole and Justin McDowell and the Louisiana Department of Environmental Quality Chemical Accident Prevent Program inspectors. The scope of the Virtual Partial Compliance Evaluation was to evaluate the facility's compliance with the CAA Section 112(r) – Prevention of Accidental Release provisions and the Chemical Accident Prevention Provision in 40 C.F.R. Part 68, as well as the General Duty Clause. This Virtual Partial Compliance Evaluation is a new compliance monitoring tool that EPA Region 6 is utilizing during the COVID-19 Public Health Emergency. This evaluation included reviewing and obtaining copies of documents and records, conducting interviews, and taking of statements via video conference. The Virtual Partial Compliance Evaluation concluded July 19, 2021, and as a result the inspectors found the below areas of concern and potential violations of the CAA.

#### Areas of Concern/Potential Violations

- 1) **40 C.F.R. § 68.67(e) – Process Hazard Analysis:** Failure to assure that the recommendations were resolved in a timely manner and failure to complete the actions as soon as possible.
  - a. Sasol failed to assure that nineteen (19) recommendations of the 2016 Process Hazard Analysis (PHA) were resolved in a timely manner and failed to complete the actions as soon as possible. The nineteen recommendations from the 2016 PHA were not completed at the time of the inspection.
- 2) **40 C.F.R. § 68.73(b) – Mechanical Integrity:** Failure to implement written procedures to maintain the on-going integrity of process equipment.

- a. Sasol failed to implement the inspection schedule required of its written procedures to maintain the on-going integrity of various process equipment (mixing tees, injection points, the corrosion under insulation inspection, dead leg inspection, the soil/air interface system).
- 3) **40 C.F.R. § 68.73(d)(1) – Mechanical Integrity:** Failure to perform inspections and tests on process equipment.
  - a. Sasol failed to perform external visual inspections and thickness examinations on various process equipment (circuits and piping lines).
- 4) **40 C.F.R. § 68.73(d)(2) – Mechanical Integrity:** Failure to implement inspection and testing procedures that follow recognized and generally accepted good engineering practices.
  - a. Sasol failed to perform and complete external piping inspections on Class 1 and Class 2 piping in the Alcohol and Ethylene Oxide (ETO) units as required by American Petroleum Institute (API) 570, failed to complete all CUI and Soil-Interface inspections for pressure vessels in the Alcohol Unit in accordance with API 510, and failed to perform internal inspections of pressure vessels, in accordance with API 510.
- 5) **40 C.F.R. §68.73(d)(3) – Mechanical Integrity:** Failure to conduct the frequency of inspections and tests of process equipment consistent with applicable manufacturers’ recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.
  - a. Sasol failed to conduct the frequency of inspections and test of process equipment consistent with applicable manufacturers’ recommendations and good engineering practices (various piping lines, piping circuits, and pumps were overdue of testing and inspections).
- 6) **40 C.F.R. § 68.73(e) – Mechanical Integrity:** Failure to correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in §68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.
  - a. Sasol failed to correct deficiencies in the piping circuit equipment and the leaking flange located on the condensate line in the ETO Unit, before further use or in a safe and timely manner when necessary means are taken to assure safe operation.
- 7) **40 C.F.R. §§ 68.75(a) & (b) – Management of Change:** Failure to implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures; and changes to stationary sources that affect a covered process.
  - a. Sasol failed to implement written procedures to manage changes to process equipment in that a management of change was not performed for the installation of a pipe clamp, that assured that the following considerations were addressed: the technical basis for the proposed change; the impact of change on safety and health; modifications to operating procedures; and the necessary time period for the change.

- 8) **40 C.F.R. § 68.79(d) – Compliance Audits:** Failure to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that the deficiencies have been corrected.
- a. Sasol failed to promptly determine an appropriate response for item numbers 35 and 38 for the 2016 Compliance Audit, and failed to document that the deficiencies had been corrected for the 2019 compliance audit findings.
- 9) **40 C.F.R. § 68.81(c) – Incident Investigation:** Failure to establish an incident team that consisted of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.
- a. Sasol failed to establish an incident investigation team, that consisted of at least one person knowledgeable in the process involved for the incident investigations that took place on July 27, 2019, December 20, 2019, December 26, 2019, December 27, 2019, and February 2, 2020.
- 10) **40 C.F.R. § 68.81(d)(4) – Incident Investigation:** Failure to prepare an incident investigation report that included the factors that contributed to the incident.
- a. Sasol failed to prepare an incident investigation report that included the factors that contributed to the incident, for the incident investigation report completed on December 20, 2019.
- 11) **40 C.F.R. § 68.81(d)(5) – Incident Investigation:** Failure to prepare an incident investigation report that included any recommendations resulting from the investigation.
- a. Sasol failed to prepare an incident investigation report that included any recommendations resulting from the investigation, for the incident investigation reports completed on July 27, 2019, December 20, 2019, December 26, 2019, December 27, 2019, and February 2, 2020.
- 12) **40 C.F.R. § 68.81(f) – Incident Investigation:** Failure to review the incident investigation report with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable.
- a. Sasol failed to review the incident investigation reports with all affected personnel whose job tasks were relevant to the incident findings, for the incident investigation reports completed on July 27, 2019, December 26, 2019, December 27, 2019, and February 2, 2020.
- 13) **40 C.F.R. § 68.73(f)(1) – Mechanical Integrity:** Failure to assure in the construction of new equipment, that the equipment as it is fabricated is suitable for the process application for which they will be used.
- a. Sasol failed to assure in the construction of the bolts designed for the vent piping on the ETO unit vessel, that the bolts were suitable for the process application for which they were used for, as the bolts were under designed and were not suitable for the high pressure of the vent piping.

- 14) **40 C.F.R. § 68.73(f)(2) – Mechanical Integrity:** Failure to perform appropriate checks and inspections to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.
- a. Sasol failed to perform the appropriate checks and inspections to assure that the process equipment valve was consistent with design specifications and the manufacturer's instructions, which resulted in a valve bonnet leak.
- 15) **40 C.F.R. § 68.69(a) – Operating Procedures:** Failure to implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information.
- a. Sasol failed to implement written operating procedures that provided clear instructions for safely conducting activities involved in each covered process consistent with the process safety information for the nitrogen purging process.

Proposed Actions:

Communications are inactive with the Respondent since the completion of the Inspection.

Compliance Status: The plan to bring the Respondent into compliance is currently being evaluated.

EPA Region 6 will work to prepare a Request for Waiver to take Administrative Enforcement Action against Sasol to initiate an Administrative Penalty Order.

Points of Contact:

Region 6: Lawrence Pittman (ORC); Justin McDowell (ECDAC)

Message

---

**From:** McDowell, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26229204C87742FCA47BF006F349DAFD-MCDOWELL, J]  
**Sent:** 2/28/2022 8:49:19 PM  
**To:** Pittman, Lawrence [Pittman.Lawrence@epa.gov]  
**Subject:** FW: Request for EJ Screen assistance for Sasol USA LLC  
**Attachments:** EJSscreen Report Sasol Chemicals.pdf; EJSscreen Report Sasol Chemicals 1-mile.pdf; EJ Screen Summary\_Sasol Waiver Pkg.docx; Detailed Facility Report \_ ECHO \_ US EPA Sasol Chemicals.pdf; EJSscreen Report Sasol Chemicals 3-mile.pdf

Sasol EJ Screen Docs.

EJ Screen Summary for Sasol Chemicals USA LLC  
Westlake, LA  
Completed 02/25/2022

#### Methodology

Initial screening uses census "Block Group" scores, for the immediate surrounding area adjacent to the facility. Enhanced screening is conducted for a 1-mile or 3-mile radius if there is a large block group, or a location within the block group is on the edge of that block group. The threshold for determining a "Potential EJ Concern Found" is when at least one of the 11 indices meets or exceeds the 80th percentile for the state, EPA region or nationally. EJ concerns are likely to be present when one or more indices exceed the 90-95 percentile range.

#### Findings

The facility does not meet the criteria for "Potential EJ Concern Found". R6 used the census Block Group for the initial determination. No EJ indices exceeded 80% percentile. The facility is not near the edge of the block group, but to confirm there is no proximity to adjacent block groups with known EJ areas, additional screens were performed for 1-mile and 3-mile radii. The total EJ scores obtained for all indices at the 1-mile and 3-mile radii were < 55 percentile at the state, regional or national levels. The facility is located northwest of Westlake, LA, along the EPA Administrator's FY2022 Journey-to-Justice community tour pathway.

#### Individual Site Characteristics

Sasol Chemicals USA LLC  
2201 OLD SPANISH TRAIL  
WESTLAKE, LA 70669  
FRS 110017418061 / LA0000002201900003  
Lat. 30.2588 Long. -93.2937

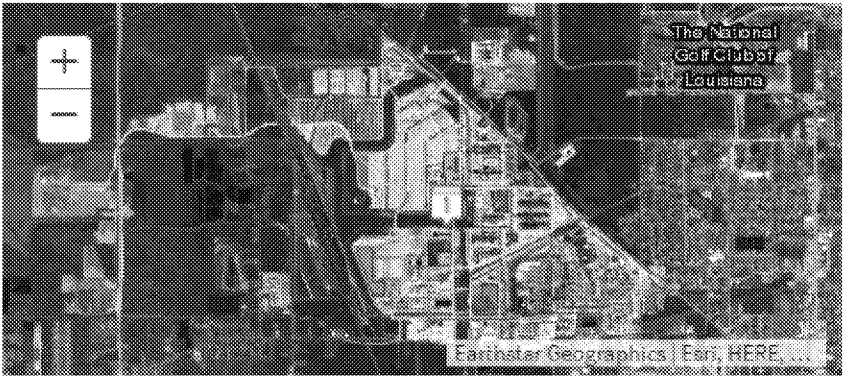
EJ Screen Results: Block group - No for EJ - Does not meet threshold.  
Also looked at 1-mile and 3-mile radii - no indices exceeded 80<sup>th</sup> percentile at the state, regional or national level.

## Detailed Facility Report

### Facility Summary

**SASOL CHEMICALS USA LLC**  
**2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669**

FRS (Facility Registry Service) ID: 110017418061  
 EPA Region: 06  
 Latitude: 30.2588  
 Longitude: -93.2937  
 Locational Data Source: EIS  
 Industries: Chemical Manufacturing  
 Indian Country: N



### Enforcement and Compliance Summary

|                                                     |                          |
|-----------------------------------------------------|--------------------------|
| Statute                                             | CAA                      |
| Insp (5 Years)                                      | 35                       |
| Date of Last Inspection                             | 07/19/2021               |
| Current Compliance Status                           | 35 Violations Identified |
| Qtrs with NC (of 12)                                | 0                        |
| Qtrs with Significant Violation                     | 0                        |
| Informal Enforcement Actions (5 years)              | 5                        |
| Formal Enforcement Actions (5 years)                | 5                        |
| Penalties from Formal Enforcement Actions (5 years) | \$39,000                 |
| EPA Cases (5 years)                                 | --                       |
| Penalties from EPA Cases (5 years)                  | --                       |
| Statute                                             | CWA                      |
| Insp (5 Years)                                      | 5                        |
| Date of Last Inspection                             | 01/27/2021               |
| Current Compliance Status                           | Violation Identified     |
| Qtrs with NC (of 12)                                | 7                        |
| Qtrs with Significant Violation                     | 4                        |
| Informal Enforcement Actions (5 years)              | 2                        |
| Formal Enforcement Actions (5 years)                | 4                        |
| Penalties from Formal Enforcement Actions (5 years) | \$60,000                 |
| EPA Cases (5 years)                                 | --                       |
| Penalties from EPA Cases (5 years)                  | --                       |

|                                                     |                         |
|-----------------------------------------------------|-------------------------|
| Statute                                             | EPCRA                   |
| Insp (5 Years)                                      | 2                       |
| Date of Last Inspection                             | 03/08/2021              |
| Current Compliance Status                           | --                      |
| Qtrs with NC (of 12)                                | --                      |
| Qtrs with Significant Violation                     | --                      |
| Informal Enforcement Actions (5 years)              | --                      |
| Formal Enforcement Actions (5 years)                | --                      |
| Penalties from Formal Enforcement Actions (5 years) | --                      |
| EPA Cases (5 years)                                 | --                      |
| Penalties from EPA Cases (5 years)                  | --                      |
| Statute                                             | RCRA                    |
| Insp (5 Years)                                      | 2                       |
| Date of Last Inspection                             | 10/21/2020              |
| Current Compliance Status                           | No Violation Identified |
| Qtrs with NC (of 12)                                | 0                       |
| Qtrs with Significant Violation                     | 0                       |
| Informal Enforcement Actions (5 years)              | --                      |
| Formal Enforcement Actions (5 years)                | --                      |
| Penalties from Formal Enforcement Actions (5 years) | --                      |
| EPA Cases (5 years)                                 | --                      |
| Penalties from EPA Cases (5 years)                  | --                      |

Regulatory Information

Clean Air Act (CAA): Operating Major (LA0000002201900003)  
Clean Water Act (CWA): Major, Permit Admin Continued (LA0003336), Minor, Permit Terminated; Compliance Tracking Off (LAG110267), Minor, Permit Terminated; Compliance Tracking Off (LAR10J919), Minor, Permit Effective (LAR10L204), Minor, Permit Effective (LAR05M448), Minor, Permit Terminated; Compliance Tracking Off (LAG420067), Minor, Permit Terminated; Compliance Tracking Off (LAG420103)  
Resource Conservation and Recovery Act (RCRA): Active LQG, TSDF (LAR000041087)  
Safe Drinking Water Act (SDWA): No Information

Other Regulatory Reports

Air Emissions Inventory (EIS): 8468011  
Greenhouse Gas Emissions (eGGRT): 1005823  
Toxic Releases (TRI): 70669VSTCHOLDSP  
Compliance and Emissions Data Reporting Interface (CEDRI): CEDRI120129

Known Data Problems

Facility/System Characteristics

Facility/System Characteristics

| System   | State | Identifier         | Universe        | Status    | Areas                                                     | Permit Expiration Date | Indian Country | Latitude  | Longitude  |
|----------|-------|--------------------|-----------------|-----------|-----------------------------------------------------------|------------------------|----------------|-----------|------------|
| FRS      |       | 110017416061       |                 |           |                                                           |                        | N              | 30.2588   | -93.2937   |
| ICIS     |       | 2200003550         |                 |           |                                                           |                        | N              | 30.250556 | -93.281111 |
| ICIS     |       | 3400069586         |                 |           |                                                           |                        | N              | 30.250556 | -93.281111 |
| ICIS     |       | 3400074831         |                 |           |                                                           |                        | N              | 30.245    | -93.2875   |
| ICIS     |       | 12131              |                 |           |                                                           |                        | N              | 30.250556 | -93.281111 |
| ICIS-Air | CAA   | LA0000002201900003 | Major Emissions | Operating | CAACFC, CAAMACT, CAANESH, CAANSFS, CAAPSD, CAASIP, CAATVP |                        | N              | 30.241902 | -93.274446 |
| CEDRI    | CAA   | CEDRI120129        |                 |           |                                                           |                        | N              | 30.24502  | -93.27563  |



| System     | State | Identifier      | Univers                                | Status                                                                | Areas                                                        | Permit Expiration Date | Indian Country | Latitude  | Longitude  |
|------------|-------|-----------------|----------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------------|------------------------|----------------|-----------|------------|
| EIS        | CAA   | 8468011         |                                        |                                                                       |                                                              |                        | N              | 30.2588   | -93.2937   |
| GHGRP      | CAA   | 1005823         | Direct Emitter                         | Reporting Year 2020: Reporting and meeting Verification requirements. | General Stationary Fuel Combustion, Petrochemical Production |                        | N              |           |            |
| RMP        | CAA   | 100000099886    |                                        | ACTIVE                                                                |                                                              |                        | N              | 30.250556 | -93.281111 |
| ICIS-NPDES | CWA   | LA0003336       | Major: NPDES Individual Permit         | Admin Continued                                                       |                                                              | 05/22/2019             | N              | 30.249722 | -93.280556 |
| ICIS-NPDES | CWA   | LAG110267       | Minor: General Permit Covered Facility | Terminated; Compliance Tracking Off                                   |                                                              | 04/03/2019             | N              | 30.246278 | -93.275472 |
| ICIS-NPDES | CWA   | LAR103919       | Minor: General Permit Covered Facility | Terminated; Compliance Tracking Off                                   | Construction Stormwater                                      | 09/30/2015             | N              | 30.24502  | -93.2756   |
| ICIS-NPDES | CWA   | LAR101204       | Minor: General Permit Covered Facility | Effective                                                             | Construction Stormwater                                      | 03/28/2022             | N              | 30.241889 | -93.274444 |
| ICIS-NPDES | CWA   | LAR05M448       | Minor: General Permit Covered Facility | Effective                                                             | Industrial Stormwater                                        | 10/26/2026             | N              | 30.255556 | -93.275278 |
| ICIS-NPDES | CWA   | LAG420067       | Minor: General Permit Covered Facility | Terminated; Compliance Tracking Off                                   |                                                              | 06/11/2019             | N              | 30.241902 | -93.274446 |
| ICIS-NPDES | CWA   | LAG420103       | Minor: General Permit Covered Facility | Terminated; Compliance Tracking Off                                   |                                                              | 10/01/2021             | N              | 30.258806 | -93.293654 |
| TRI        | EP313 | 70669VSTCHOLDSP | Toxics Release Inventory               | Last Reported for 2020                                                |                                                              |                        | N              | 30.241902 | -93.274446 |
| RCRAInfo   | RCRA  | LAR000041087    | LQG, TSDF                              | Active (HPA )                                                         |                                                              |                        | N              | 30.250556 | -93.281111 |
| TSCA       | TSCA  | TSCA109984      |                                        |                                                                       |                                                              |                        | N              | 30.24502  | -93.27563  |
| TSCA       | TSCA  | TSCA5950        |                                        |                                                                       |                                                              |                        | N              | 30.241902 | -93.274446 |
| TSCA       | TSCA  | 100607872       |                                        |                                                                       |                                                              |                        | N              | 30.24502  | -93.2756   |
| TSCA       | TSCA  | TSCA83123       |                                        |                                                                       |                                                              |                        | N              | 30.241902 | -93.274446 |

## Facility Address

| System     | State | Identifier         | Facility Name                                              | Facility Address                               | Facility County  |
|------------|-------|--------------------|------------------------------------------------------------|------------------------------------------------|------------------|
| FRS        |       | 110017418061       | SASOL CHEMICALS USA LLC                                    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS       |       | 22000031550        | SASOL NORTH AMERICA INC.                                   | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS       |       | 3400069586         | SASOL NORTH AMERICA INC.                                   | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS       |       | 3400074831         | SASOL NORTH AMERICA INC                                    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS       |       | 12131              | CONDEA VISTA COMPANY LAKE CHARLES CHEMICAL COMPLEX         | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-Air   | CAA   | LA0000002201900003 | SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| CEDRI      | CAA   | CEDRI120129        | SASOL CHEMICALS (USA) LLC                                  | 2201 OLD SPANISH TRI, WESTLAKE, LA 70669       | Calcasieu Parish |
| EIS        | CAA   | 8468011            | SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| GHGRP      | CAA   | 1005823            | Sasol Chemicals (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| RMP        | CAA   | 100000099886       | SASOL CHEMICALS USA LLC                                    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LA0003336          | SASOL NORTH AMERICA, INC. - LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAG110267          | DUNHAM PRICE INDUSTRIAL LLC                                | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAR103919          | SASOL NORTH AMERICA INC.                                   | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAR101204          | SASOL CHEMICALS (USA), LLC                                 | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAR05M448          | SASOL NORTH AMERICA INC                                    | LAKE CHARLES CHEMICAL COMP, WESTLAKE, LA 70669 | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAG420067          | SASOL CHEMICALS (USA), LLC- LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| ICIS-NPDES | CWA   | LAG420103          | SASOL CHEMICALS (USA), LLC - LAKE CHARLES CHEMICAL COMPLEX | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| TRI        | EP313 | 70669VSTCHOLDSP    | SASOL CHEMICALS (USA) LLC-LAKE CHARLES CHEMICAL COMPLEX    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| RCRAInfo   | RCRA  | LAR000041087       | SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| TSCA       | TSCA  | TSCA109984         | SASOL CHEMICALS (USA) LLC                                  | 2201 OLD SPANISH TRI, WESTLAKE, LA 70669       | Calcasieu Parish |
| TSCA       | TSCA  | TSCA5950           | SASOL NORTH AMERICA INC - LAKE CHARLES CHEMICAL COMPLEX    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     |                  |
| TSCA       | TSCA  | 100607872          | SASOL NORTH AMERICA INC - LAKE CHARLES CHEMICAL COMPLEX    | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |
| TSCA       | TSCA  | TSCA83123          | SASOL CHEMICALS (USA) LLC                                  | 2201 OLD SPANISH TRAIL, WESTLAKE, LA 70669     | Calcasieu Parish |

## Facility SIC (Standard Industrial Classification) Codes

| System     | Identifier         | SIC Code | SIC Description                 |
|------------|--------------------|----------|---------------------------------|
| TRI        | 70669VSTCHOLDSP    | 2819     | Industrial Inorganic Chemicals  |
| TRI        | 70669VSTCHOLDSP    | 2843     | Surface Active Agents           |
| TRI        | 70669VSTCHOLDSP    | 2865     | Cyclic Crudes And Intermediates |
| TRI        | 70669VSTCHOLDSP    | 2869     | Industrial Organic Chemicals    |
| ICIS-Air   | LA0000002201900003 | 2869     | Industrial Organic Chemicals    |
| ICIS-NPDES | LA0003336          | 2869     | Industrial Organic Chemicals    |
| NPDES      | LA0003336          | 2869     | Industrial Organic Chemicals    |
| ICIS-NPDES | LAG110267          | 3273     | Ready-Mixed Concrete            |
| NPDES      | LAG110267          | 3273     | Ready-Mixed Concrete            |
| ICIS-NPDES | LAG420103          | 4953     | Refuse Systems                  |

## Facility NAICS (North American Industry Classification System) Codes

| System | Identifier      | NAICS Code | NAICS Description                                                     |
|--------|-----------------|------------|-----------------------------------------------------------------------|
| RMP    | 100000099886    | 32511      | Petrochemical Manufacturing                                           |
| RMP    | 100000099886    | 326112     | Plastics Packaging Film and Sheet (including Laminated) Manufacturing |
| RMP    | 100000099886    | 32619      | Other Plastics Product Manufacturing                                  |
| RMP    | 100000099886    | 49311      | General Warehousing and Storage                                       |
| GHGRP  | 1005823         | 325199     | All Other Basic Organic Chemical Manufacturing                        |
| TRI    | 70669VSTCHOLDSP | 325110     | Petrochemical Manufacturing                                           |
| TRI    | 70669VSTCHOLDSP | 325120     | Industrial Gas Manufacturing                                          |
| TRI    | 70669VSTCHOLDSP | 325180     | Other Basic Inorganic Chemical Manufacturing                          |
| TRI    | 70669VSTCHOLDSP | 325188     | All Other Basic Inorganic Chemical Manufacturing                      |

| System     | Identifier | SIC Code | SIC Description                |
|------------|------------|----------|--------------------------------|
| ICIS-NPDES | LAR05M448  | 2819     | Industrial Inorganic Chemicals |
| ICIS-NPDES | LAR05M448  | 2869     | Industrial Organic Chemicals   |

Facility Industrial Effluent Guidelines

| Identifier               | Effluent Guideline (40 CFR Part) | Effluent Guideline Description |
|--------------------------|----------------------------------|--------------------------------|
| No data records returned |                                  |                                |

| System   | Identifier         | NAICS Code | NAICS Description                              |
|----------|--------------------|------------|------------------------------------------------|
| TRI      | 70669VSTCHOLDSP    | 325199     | All Other Basic Organic Chemical Manufacturing |
| EIS      | 8468011            | 325110     | Petrochemical Manufacturing                    |
| ICIS-Air | LA0000002201900003 | 325110     | Petrochemical Manufacturing                    |
| RCRAInfo | LAR000041087       | 325110     | Petrochemical Manufacturing                    |

Facility Tribe Information

| Reservation Name         | Tribe Name | EPA Tribal ID | Distance to Tribe (miles) |
|--------------------------|------------|---------------|---------------------------|
| No data records returned |            |               |                           |

Enforcement and Compliance

Compliance Monitoring History (5 years)

| Statute | Source ID          | System     | Activity Type         | Compliance Monitoring Type | Lead Agency | Date       | Finding (if applicable)                              |
|---------|--------------------|------------|-----------------------|----------------------------|-------------|------------|------------------------------------------------------|
| CAA     | LA0000002201900003 | ICIS-Air   | Information Request   | Formal                     | EPA         | 01/25/2022 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | EPA         | 07/19/2021 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/31/2021 | Reviewed: 05/05/2021 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/30/2021 | Reviewed: 04/21/2021 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE On-Site                | State       | 03/15/2021 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Stack Test             | State       | 07/23/2020 | Findings: Pass                                       |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Stack Test             | State       | 05/19/2020 | Findings: Pass                                       |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/31/2020 | Reviewed: 05/18/2020 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/31/2020 | Reviewed: 05/18/2020 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/30/2020 | Reviewed: 05/18/2020 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/30/2020 | Reviewed: 05/18/2020 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/23/2020 | Reviewed: 05/20/2020 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/23/2020 | Reviewed: 05/18/2020 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | EPA         | 12/04/2019 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Stack Test             | State       | 09/11/2019 | Findings: Pass                                       |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Stack Test             | State       | 06/06/2019 | Findings: Pass                                       |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/29/2019 | Reviewed: 08/16/2019 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/28/2019 | Reviewed: 08/16/2019 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/27/2019 | Reviewed: 08/16/2019 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | EPA         | 03/12/2019 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/07/2019 | Reviewed: 05/28/2019 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | State       | 10/26/2018 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE On-Site                | State       | 05/01/2018 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | EPA         | 04/29/2018 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Off-Site               | State       | 04/19/2018 |                                                      |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 04/02/2018 | Reviewed: 04/16/2018 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/29/2018 | Reviewed: 04/16/2018 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/28/2018 | Reviewed: 04/16/2018 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/20/2018 | Reviewed: 04/16/2018 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Stack Test             | State       | 02/20/2018 | Findings: Pass                                       |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/30/2017 | Reviewed: 04/20/2017 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/29/2017 | Reviewed: 04/20/2017 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/27/2017 | Reviewed: 04/12/2017 Facility Reported No Deviations |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/27/2017 | Reviewed: 04/11/2017 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/23/2017 | Reviewed: 04/11/2017 Facility Reported Deviations    |
| CAA     | LA0000002201900003 | ICIS-Air   | Inspection/Evaluation | PCE Title V CCR            | State       | 03/23/2017 | Reviewed: 04/12/2017 Facility Reported No Deviations |
| CWA     | LA0003336          | ICIS-NPDES | Inspection/Evaluation | Base Program - Evaluation  | State       | 01/27/2021 |                                                      |
| CWA     | LA0003336          | ICIS-NPDES | Inspection/Evaluation | Base Program - Evaluation  | State       | 09/25/2018 |                                                      |
| CWA     | LA0003336          | ICIS-NPDES | Inspection/Evaluation | Base Program - Evaluation  | State       | 06/06/2018 |                                                      |
| CWA     | LAG420103          | ICIS-NPDES | Inspection/Evaluation | Base Program - Evaluation  | State       | 01/27/2021 |                                                      |

| State | Source ID       | System     | Activity Type         | Compliance Monitoring Type                       | Lead Agency | Date       | Finding (if applicable)                       |
|-------|-----------------|------------|-----------------------|--------------------------------------------------|-------------|------------|-----------------------------------------------|
| CWA   | LAR05M448       | ICIS-NPDES | Inspection/Evaluation | Base Program, Industrial Stormwater - Evaluation | State       | 01/27/2021 |                                               |
| EPCRA | 70669VSTCHOLDSP | ICIS       | Offsite Record Review | Data Audit                                       | EPA         | 03/08/2021 |                                               |
| EPCRA | 70669VSTCHOLDSP | ICIS       | Offsite Record Review | Data Audit                                       | EPA         | 03/12/2020 |                                               |
| RCRA  | LAR000041087    | RCRAInfo   |                       | GROUNDWATER MONITORING EVALUATION                | State       | 10/21/2020 | No Violations Or Compliance Issues Were Found |
| RCRA  | LAR000041087    | RCRAInfo   |                       | COMPLIANCE EVALUATION INSPECTION ON-SITE         | State       | 06/18/2019 | No Violations Or Compliance Issues Were Found |

Entries in italics are not counted in EPA compliance monitoring strategies or annual results.



Compliance Summary Data

| State | Source ID          | Current SNC (Significant Noncompliance)/HPV (High Priority Violation) | Current As Of | Qtrs with NC (Noncompliance) (of 12) | Data Last Refreshed |
|-------|--------------------|-----------------------------------------------------------------------|---------------|--------------------------------------|---------------------|
| CAA   | LA0000002201900003 | No                                                                    | 02/19/2022    | 0                                    | 02/18/2022          |
| CWA   | LA0003336          | No                                                                    | 09/30/2021    | 5                                    | 02/18/2022          |
| CWA   | LAG110267          | No                                                                    | 09/30/2021    | 0                                    | 02/18/2022          |
| CWA   | LAR10J919          | No                                                                    | 09/30/2021    | 0                                    | 02/18/2022          |
| CWA   | LAR10L204          | No                                                                    | 09/30/2021    | 0                                    | 02/18/2022          |
| CWA   | LAR05M448          | No                                                                    | 09/30/2021    | 0                                    | 02/18/2022          |
| CWA   | LAG429067          | No                                                                    | 09/30/2021    | 3                                    | 02/18/2022          |
| CWA   | LAG429103          | No                                                                    | 09/30/2021    | 1                                    | 02/18/2022          |
| RCRA  | LAR000041087       | No                                                                    | 02/19/2022    | 0                                    | 02/18/2022          |

Three-Year Compliance History by Quarter

| State | Program/Pollutant/Violation Type | QTR 1                    | QTR 2                    | QTR 3                    | QTR 4                    | QTR 5                    | QTR 6                    | QTR 7                    | QTR 8                    | QTR 9                    | QTR 10                   | QTR 11                   | QTR 12+                  |
|-------|----------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| CAA   | (Source ID: LA0000002201900003)  | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/01-12/31/21           | 01/01-03/31/22           |
|       | Facility-Level Status            | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified |
|       | HPV History                      |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |
|       | Violation Type                   | Agency                   | Programs                 | Pollutants               |                          |                          |                          |                          |                          |                          |                          |                          |                          |

| State | Program/Pollutant/Violation Type       | QTR 1                    | QTR 2                    | QTR 3                                | QTR 4                    | QTR 5                    | QTR 6                    | QTR 7                    | QTR 8                                | QTR 9                    | QTR 10                   | QTR 11                   | QTR 12                   | Q       |
|-------|----------------------------------------|--------------------------|--------------------------|--------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|---------|
| CWA   | (Source ID: LA0003336)                 | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19                       | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20                       | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0    |
|       | Facility-Level Status                  | No Violations Identified | Violation Identified     | Significant Compliance Noncompliance | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | Significant Compliance Noncompliance | No Violations Identified | Violation Identified     | No Violations Identified | No Violations Identified | Viol Id |
|       | Quarterly Noncompliance Report History | Resolved                 | Reportable Noncompliance | Effluent - Monthly Average Limit     | Resolved - Pending       | Resolved - Pending       | Resolved - Pending       | Resolved - Pending       | Effluent - Monthly Average Limit     | Resolved - Pending       | Reportable Noncompliance | Resolved - Pending       | Resolved - Pending       |         |
|       | Pollutant                              | Disch Point              | Mon Loc                  | Freq                                 |                          |                          |                          |                          |                                      |                          |                          |                          |                          |         |
| CWA   | BOD <sub>5</sub> , 5-day, 20 deg C     | 001 - A                  | Effluent Gross           | Mthly                                |                          | LIMIT VIOLATION          |                          |                          |                                      |                          |                          |                          |                          |         |
| CWA   | BOD <sub>5</sub> , 5-day, 20 deg C     | 001 - A                  | Effluent Gross           | NMth                                 |                          | LIMIT VIOLATION          |                          |                          |                                      |                          |                          |                          |                          |         |
| CWA   | Coliform, fecal, general               | 001 - Q                  | Effluent Gross           | Mthly                                |                          |                          |                          |                          |                                      |                          | 160%                     |                          |                          |         |

|     |                                    |         |                |       |  |  |                 |                 |                 |                 |  |                 |  |  |
|-----|------------------------------------|---------|----------------|-------|--|--|-----------------|-----------------|-----------------|-----------------|--|-----------------|--|--|
| CWA | Coliform, fecal, general           | 001 - Q | Effluent Gross | NMth  |  |  |                 |                 |                 |                 |  | 30%             |  |  |
| CWA | BOD <sub>5</sub> , 5-day, 20 deg C | 081 - A | Effluent Gross | Mthly |  |  | LIMIT VIOLATION |                 | LIMIT VIOLATION | LIMIT VIOLATION |  |                 |  |  |
| CWA | BOD <sub>5</sub> , 5-day, 20 deg C | 081 - A | Effluent Gross | NMth  |  |  | LIMIT VIOLATION | LIMIT VIOLATION | LIMIT VIOLATION | LIMIT VIOLATION |  |                 |  |  |
| CWA | Chlorofarm                         | 081 - B | Effluent Gross | Mthly |  |  |                 |                 |                 |                 |  | 9%              |  |  |
| CWA | Coliform, fecal, general           | 081 - Q | Effluent Gross | Mthly |  |  |                 |                 |                 |                 |  | LIMIT VIOLATION |  |  |
| CWA | Coliform, fecal, general           | 081 - Q | Effluent Gross | NMth  |  |  |                 |                 |                 |                 |  | LIMIT VIOLATION |  |  |

| Status: Program/Pollutant/Violation Type |                                                                     |                                  |                          |                                  | QTR 1                    | QTR 2                    | QTR 3                    | QTR 4                    | QTR 5                    | QTR 6                    | QTR 7                    | QTR 8                    | QTR 9                    | QTR 10                   | QTR 11                   | QTR 12                   | Q     |
|------------------------------------------|---------------------------------------------------------------------|----------------------------------|--------------------------|----------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-------|
| CWA                                      | Solids, total suspended                                             | 081 - A                          | Effluent Gross           | NMth                             |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          | 89%                      |                          |       |
| CWA                                      | pH range excursions, > 60 minutes                                   | 081 - A                          | Effluent Gross           | NMth                             |                          | LIMIT VIOLATION          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | pH                                                                  | 090 - Q                          | Effluent Gross           | NMth                             |                          |                          |                          |                          |                          |                          |                          |                          |                          | LIMIT VIOLATION          |                          |                          |       |
| CWA                                      | pH                                                                  | 091 - Q                          | Effluent Gross           | NMth                             |                          |                          |                          |                          |                          |                          |                          |                          | LIMIT VIOLATION          | LIMIT VIOLATION          |                          |                          |       |
| CWA                                      | Coliform, fecal, general                                            | B01 - Q                          | Effluent Gross           | NMth                             |                          |                          | 7%                       |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Copper, total [as Cu]                                               | B01 - Q                          | Effluent Gross           | Mthly                            |                          | 217%                     | 750%                     |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Copper, total [as Cu]                                               | B01 - Q                          | Effluent Gross           | NMth                             |                          | 36%                      | 264%                     |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Nickel, total [as Ni]                                               | B01 - Q                          | Effluent Gross           | Mthly                            |                          |                          | 100%                     |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
|                                          | Single Event Violations                                             | NPDES Violation ID               | Agency                   |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Effluent Violations - Unauthorized Discharge                        | 3643392613                       | State                    |                                  |                          | 05/22/2019               |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Effluent Violations - Unauthorized Discharge                        | 3662018857                       | State                    |                                  |                          |                          |                          | 12/11/2019               |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Management Practice Violations - Improper Operation and Maintenance | 3643392677                       | State                    |                                  |                          | 05/22/2019               |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
|                                          | Compliance Schedule Violations                                      | Case No.                         |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Achieve Final Compliance With All Obligations Under This order      | LA-SAWF210923                    |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          | 10/11 |
| CWA                                      | Pay Required Civil Penalty Amount                                   | LA-SAWF210923                    |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          | 10/11 |
|                                          | Late or Missing Discharge Monitoring Report (DMR) Measurements      |                                  |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
|                                          | Counts of Late DMR Measurements                                     |                                  |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          | 2                        |                          |                          |       |
|                                          | Counts of Missing DMR Measurements                                  |                                  |                          | 30                               | 2                        |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA (Source ID: LAG110267)               |                                                                     |                                  |                          |                                  | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0  |
|                                          | Facility-Level Status                                               | No Violations Identified         | No Violations Identified | Unknown                          | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Te    |
|                                          | Quarterly Noncompliance Report History                              |                                  |                          | Undetermined                     | Undetermined             |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA (Source ID: LAR10J919)               |                                                                     |                                  |                          |                                  | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0  |
|                                          | Facility-Level Status                                               | Terminated Permit                | Terminated Permit        | Terminated Permit                | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Te    |
|                                          | Quarterly Noncompliance Report History                              |                                  |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA (Source ID: LAR10L204)               |                                                                     |                                  |                          |                                  | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0  |
|                                          | Facility-Level Status                                               | No Violations Identified         | No Violations Identified | No Violations Identified         | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | Und   |
|                                          | Quarterly Noncompliance Report History                              |                                  |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA (Source ID: LAR05M448)               |                                                                     |                                  |                          |                                  | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0  |
|                                          | Facility-Level Status                                               | No Violations Identified         | No Violations Identified | No Violations Identified         | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | No Violations Identified | Und   |
|                                          | Quarterly Noncompliance Report History                              |                                  |                          |                                  |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA (Source ID: LAG420667)               |                                                                     |                                  |                          |                                  | 10/01-12/31/18           | 01/01-03/31/19           | 04/01-06/30/19           | 07/01-09/30/19           | 10/01-12/31/19           | 01/01-03/31/20           | 04/01-06/30/20           | 07/01-09/30/20           | 10/01-12/31/20           | 01/01-03/31/21           | 04/01-06/30/21           | 07/01-09/30/21           | 10/0  |
|                                          | Facility-Level Status                                               | No Violations Identified         | Violation Identified     | No Violations Identified         | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Terminated Permit        | Te    |
|                                          | Quarterly Noncompliance Report History                              | Effluent - Monthly Average Limit | Reportable Noncompliance | Effluent - Monthly Average Limit | Resolved - Pending       |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
|                                          | Pollutant                                                           | Disch Point                      | Mon Loc                  | Freq                             |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Solids, total suspended                                             | 001 - A                          | Effluent Gross           | Mthly                            |                          |                          | 502%                     |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |
| CWA                                      | Solids, total suspended                                             | 001 - A                          | Effluent Gross           | NMth                             |                          |                          | 667%                     |                          |                          |                          |                          |                          |                          |                          |                          |                          |       |

| Statute                    | Program/Pollutant/Violation Type                               |         |                |       | QTR 1                   | QTR 2                   | QTR 3                   | QTR 4                   | QTR 5                   | QTR 6                   | QTR 7                   | QTR 8                   | QTR 9                                | QTR 10                  | QTR 11                  | QTR 12                  | Q                       |
|----------------------------|----------------------------------------------------------------|---------|----------------|-------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| CWA                        | Carbon, not agitated (TOC)                                     | 004 - A | Effluent Gross | NMdh  | 100%                    |                         |                         |                         |                         |                         |                         |                         |                                      |                         |                         |                         |                         |
| CWA                        | Solids, total suspended                                        | 004 - A | Effluent Gross | Mdhly | 17%                     |                         |                         |                         |                         |                         |                         |                         |                                      |                         |                         |                         |                         |
| CWA                        | Solids, total suspended                                        | 004 - A | Effluent Gross | NMdh  | 84%                     |                         |                         |                         |                         |                         |                         |                         |                                      |                         |                         |                         |                         |
| CWA (Source ID: LAG420103) |                                                                |         |                |       | 10/01-12/31/18          | 01/01-03/31/19          | 04/01-06/30/19          | 07/01-09/30/19          | 10/01-12/31/19          | 01/01-03/31/20          | 04/01-06/30/20          | 07/01-09/30/20          | 10/01-12/31/20                       | 01/01-03/31/21          | 04/01-06/30/21          | 07/01-09/30/21          | 10/01-12/31/21          |
|                            | Facility-Level Status                                          |         |                |       | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified              | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified |
|                            | Quarterly Noncompliance Report History                         |         |                |       |                         |                         |                         |                         |                         |                         |                         |                         | Failure to Report DMR - Not Received | Resolved                |                         |                         |                         |
|                            | Late or Missing Discharge Monitoring Report (DMR) Measurements |         |                |       |                         |                         |                         |                         |                         |                         |                         |                         |                                      |                         |                         |                         |                         |
|                            | Counts of Late DMR Measurements                                |         |                |       |                         |                         |                         |                         |                         |                         |                         |                         | 20                                   |                         |                         |                         |                         |

| Statute                        | Program/Pollutant/Violation Type | QTR 1                   | QTR 2                   | QTR 3                   | QTR 4                   | QTR 5                   | QTR 6                   | QTR 7                   | QTR 8                   | QTR 9                   | QTR 10                  | QTR 11                  | QTR 12+                 |
|--------------------------------|----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| RCRA (Source ID: LAR000041067) |                                  | 04/01-06/30/19          | 07/01-09/30/19          | 10/01-12/31/19          | 01/01-03/31/20          | 04/01-06/30/20          | 07/01-09/30/20          | 10/01-12/31/20          | 01/01-03/31/21          | 04/01-06/30/21          | 07/01-09/30/21          | 10/01-12/31/21          | 01/01-03/31/22          |
|                                | Facility-Level Status            | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified | No Violation Identified |

## Informal Enforcement Actions (5 Years)

| Statute | System     | Source ID          | Type of Action                                     | Lead Agency | Date       |
|---------|------------|--------------------|----------------------------------------------------|-------------|------------|
| CAA     | ICIS-Air   | LA0000002201900003 | Notice of Noncompliance Issued                     | EPA         | 01/24/2022 |
| CAA     | ICIS-Air   | LA0000002201900003 | Notice of Violation                                | State       | 08/23/2021 |
| CAA     | ICIS-Air   | LA0000002201900003 | Warning Letter                                     | State       | 06/23/2020 |
| CAA     | ICIS-Air   | LA0000002201900003 | Notice of Violation                                | EPA         | 06/03/2019 |
| CAA     | ICIS-Air   | LA0000002201900003 | Notice of Violation                                | State       | 02/12/2018 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Phone Call/ EMAIL                   | State       | 03/04/2021 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Under Review                        | State       | 10/06/2020 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Under Review                        | State       | 08/08/2019 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Letter of Violation/ Warning Letter | State       | 05/16/2019 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Under Review                        | State       | 03/16/2019 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Phone Call/ EMAIL                   | State       | 11/03/2018 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Under Review                        | State       | 11/09/2017 |
| CWA     | ICIS-NPDES | LA0003336          | Base Program - Letter of Violation/ Warning Letter | State       | 11/07/2017 |

Entries in italics are not counted as "informal enforcement actions" in EPA policies pertaining to enforcement response tools.

## Formal Enforcement Actions (5 Years)

| Statute | System     | Law/Section | Source ID                          | Action Type             | Case No.       | Lead Agency | Case Name                                                             | Issued/Filed Date | Settlements/Actions | Settlement/Action Date | Federal Penalty Assessed | State/Local Penalty Assessed | Penalty Amount Collected | SEP Cost | Comp Action Cost |
|---------|------------|-------------|------------------------------------|-------------------------|----------------|-------------|-----------------------------------------------------------------------|-------------------|---------------------|------------------------|--------------------------|------------------------------|--------------------------|----------|------------------|
| CAA     | ICIS-Air   | 112[R][1]   | AIR/LA0000002201900003             | Administrative - Formal | 06-2020-3336   | EPA         | Sasol Chemicals-Westlake, LA-RMP CAFO-FY2020                          | 07/08/2020        | 1                   | 07/13/2020             | \$38,000                 | \$0                          | \$38,000                 | \$0      | \$0              |
| CAA     | ICIS-Air   | 112[R][1]   | AIR/LA0000002201900003             | Administrative - Formal | 06-2020-3340   | EPA         | Sasol Chemicals-Westlake, LA-RMP AOC-FY2020                           | 07/08/2020        | 1                   | 07/09/2020             | \$0                      | \$0                          |                          | \$0      | \$0              |
| CAA     | ICIS-Air   | 110         | AIR/LA0000002201900003             | Administrative - Formal | 06-2019-3354   | EPA         | Sasol Chemicals (USA) LLC - Lake Charles Chemical Complex - AOC ECDAT | 08/08/2019        | 1                   | 08/08/2019             | \$0                      | \$0                          |                          | \$0      | \$0              |
| CAA     | ICIS-Air   | OTHER       | AIR/LA0000002201900003             | Administrative - Formal | LA0609A2826352 | State       | Sasol Chemicals (USA) LLC - Lake Charles Chemical Complex             | 11/27/2018        | 1                   | 11/27/2018             | \$0                      | \$0                          |                          | \$0      | \$0              |
| CAA     | ICIS-Air   | OTHER       | AIR/LA0000002201900003             | Administrative - Formal | LA0609A2710655 | State       | Sasol Chemicals (USA) LLC - Lake Charles Chemical Complex             | 06/26/2018        | 1                   | 06/26/2018             | \$0                      | \$1,000                      |                          | \$0      | \$0              |
| CWA     | ICIS-NPDES | OTHER       | NPDES/LA0420067<br>NPDES/LA0003336 | Administrative - Formal | LA-SAWE210023  | State       | SAWE210023                                                            | 05/20/2021        | 1                   | 09/17/2021             | \$0                      | \$30,000                     | \$30,000                 | \$0      | \$0              |
| CWA     | ICIS-NPDES | OTHER       | NPDES/LA0003336<br>NPDES/LA0420067 | Administrative - Formal | LA-WECN1701049 | State       | WECN1701049                                                           | 09/23/2019        | 1                   | 09/23/2019             | \$0                      | \$0                          |                          | \$0      | \$0              |

## Environmental Conditions

Watershed(s)

| 12-Digit WBD (Watershed Boundary Dataset) HUC (RAD Reach Address Database) | WBD (Watershed Boundary Dataset) Subwatershed Name (RAD Reach Address Database) | State Water Body Name (ICIS (Integrated Compliance Information System)) | Beach Closures: Within Last Year | Beach Closures: Within Last Two Years | Pollutants Potentially Related to Impairment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Watershed with ESA (Endangered Species Act)-listed Aquatic Species? |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------|-------------------------------------------------------------------------|----------------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| 080802050405                                                               | Richards Lake-Houston River                                                     | 0315                                                                    | No                               | No                                    | 1,1,1-Trichloroethane   1,1,2-Trichloroethane   1,1-Dichloroethane   1,1-Dichloroethylene   1,2,4-Trichlorobenzene   1,2-Dichlorobenzene   1,2-Dichloroethane   1,2-Dichloropropane   1,2-trans-Dichloroethylene   1,3-Dichlorobenzene   1,3-Dichloropropylene   1,4-Dichlorobenzene   2,4-Dichlorophenol   2,4-Dimethylphenol   2,4-Dinitrophenol   2,4-Dinitrotoluene   2,6-Dinitrotoluene   2-Chlorophenol   2-Methylanthralene   2-Nitrophenol   4,6-Dinitro-o-cresol   4-Nitrophenol   Acenaphthene   Acenaphthylene   Acrylonitrile   Andracene   BOD, 5-day, 20 deg. C   Benzene   Benzo(a)anthracene   Benzo(a)pyrene   Benzo(b)fluoranthene   Benzo(k)fluoranthene   Bis(2-ethylhexyl) phthalate   Carbon tetrachloride   Carbon, tot organic (TOC)   Chlorobenzene   Chloroethane   Chloroform   Chrysene   Coliform, fecal general   Di-n-butyl phthalate   Dibenz(a,h)anthracene   Diethyl phthalate   Dimethyl phthalate   Ethylbenzene   Fluoranthene   Fluorene   Hexachlorobenzene   Hexachlorobutadiene   Hexachloroethane   Mercury, total (as Hg)   Methyl chloride (Chloromethane)   Methylene chloride   Naphthalene   Nitrobenzene   Oxygen demand, chem. (high level) (COD)   Phenanthrene   Phenol   Pyrene   Solids, total suspended   Tetrachloroethylene   Toluene   Trichloroethylene   Vinyl chloride | No                                                                  |
| 080802050504                                                               | Moss Gully-West Fork Calcasieu River                                            | 0315                                                                    | No                               | No                                    | 1,1,1-Trichloroethane   1,1,2-Trichloroethane   1,1-Dichloroethane   1,1-Dichloroethylene   1,2,4-Trichlorobenzene   1,2-Dichlorobenzene   1,2-Dichloroethane   1,2-Dichloropropane   1,2-trans-Dichloroethylene   1,3-Dichlorobenzene   1,3-Dichloropropylene   1,4-Dichlorobenzene   2,4-Dichlorophenol   2,4-Dimethylphenol   2,4-Dinitrophenol   2,4-Dinitrotoluene   2,6-Dinitrotoluene   2-Chlorophenol   2-Methylanthralene   2-Nitrophenol   4,6-Dinitro-o-cresol   4-Nitrophenol   Acenaphthene   Acenaphthylene   Acrylonitrile   Andracene   BOD, 5-day, 20 deg. C   Benzene   Benzo(a)anthracene   Benzo(a)pyrene   Benzo(b)fluoranthene   Benzo(k)fluoranthene   Bis(2-ethylhexyl) phthalate   Carbon tetrachloride   Carbon, tot organic (TOC)   Chlorobenzene   Chloroethane   Chloroform   Chrysene   Coliform, fecal general   Di-n-butyl phthalate   Dibenz(a,h)anthracene   Diethyl phthalate   Dimethyl phthalate   Ethylbenzene   Fluoranthene   Fluorene   Hexachlorobenzene   Hexachlorobutadiene   Hexachloroethane   Mercury, total (as Hg)   Methyl chloride (Chloromethane)   Methylene chloride   Naphthalene   Nitrobenzene   Oxygen demand, chem. (high level) (COD)   Phenanthrene   Phenol   Pyrene   Solids, total suspended   Tetrachloroethylene   Toluene   Trichloroethylene   Vinyl chloride | No                                                                  |
| 080802060302                                                               | Bayou Verdine-Calcasieu River                                                   | 0315                                                                    | No                               | No                                    | 1,1,1-Trichloroethane   1,1,2-Trichloroethane   1,1-Dichloroethane   1,1-Dichloroethylene   1,2,4-Trichlorobenzene   1,2-Dichlorobenzene   1,2-Dichloroethane   1,2-Dichloropropane   1,2-trans-Dichloroethylene   1,3-Dichlorobenzene   1,3-Dichloropropylene   1,4-Dichlorobenzene   2,4-Dichlorophenol   2,4-Dimethylphenol   2,4-Dinitrophenol   2,4-Dinitrotoluene   2,6-Dinitrotoluene   2-Chlorophenol   2-Methylanthralene   2-Nitrophenol   4,6-Dinitro-o-cresol   4-Nitrophenol   Acenaphthene   Acenaphthylene   Acrylonitrile   Andracene   BOD, 5-day, 20 deg. C   Benzene   Benzo(a)anthracene   Benzo(a)pyrene   Benzo(b)fluoranthene   Benzo(k)fluoranthene   Bis(2-ethylhexyl) phthalate   Carbon tetrachloride   Carbon, tot organic (TOC)   Chlorobenzene   Chloroethane   Chloroform   Chrysene   Coliform, fecal general   Di-n-butyl phthalate   Dibenz(a,h)anthracene   Diethyl phthalate   Dimethyl phthalate   Ethylbenzene   Fluoranthene   Fluorene   Hexachlorobenzene   Hexachlorobutadiene   Hexachloroethane   Mercury, total (as Hg)   Methyl chloride (Chloromethane)   Methylene chloride   Naphthalene   Nitrobenzene   Oxygen demand, chem. (high level) (COD)   Phenanthrene   Phenol   Pyrene   Solids, total suspended   Tetrachloroethylene   Toluene   Trichloroethylene   Vinyl chloride | No                                                                  |

Assessed Waters From Latest State Submission (ATTAINS)

| State | Report Cycle | Assessment Unit ID | Assessment Unit Name                                                                                                                                                                                                                        | Water Condition                                  | Cause Groups Impaired                                                                        | Drinking Water Use | Aquatic Life Consumption Use | Fish Recreation Use | Other Use        |
|-------|--------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------|------------------------------|---------------------|------------------|
| LA    | 2020         | LA030306_00        | Bayou Verdine-south of the Houston River Canal to the Calcasieu River (Estuarine)                                                                                                                                                           | Impaired - 303(d) Listed - With Restoration Plan | PATHOGENS   PESTICIDES   POLYCHLORINATED BIPHENYLS (PCBS)   TOXIC ORGANICS   TURBIDITY       |                    | Not Supporting               |                     | Not Supporting   |
| LA    | 2020         | LA030301_00        | Calcasieu River and Ship Channel-From saltwater barrier to Moss Lake; includes Ship Channel, Coon Island Loop, and Clooney Island Loop (Estuarine)                                                                                          | Impaired - 303(d) Listed - With Restoration Plan | DIOXINS   PATHOGENS   POLYCHLORINATED BIPHENYLS (PCBS)                                       |                    | Not Supporting               |                     | Not Supporting   |
| LA    | 2020         | LA030302_00        | Lake Charles                                                                                                                                                                                                                                | Impaired - 303(d) Listed - With Restoration Plan | DIOXINS   ORGANIC ENRICHMENT/OXYGEN DEPLETION   PATHOGENS   POLYCHLORINATED BIPHENYLS (PCBS) |                    | Not Supporting               |                     | Not Supporting   |
| LA    | 2020         | LA030302_001       | Lake Charles North Beach-Located within subsegment LA030302_00. This unit is added for swimming advisory tracking purposes only and is not a subsegment as defined by LAC 33:IX.1123.A. et seq. No other assessment is made for this bayou. | Impaired - 303(d) Listed                         | PATHOGENS                                                                                    |                    |                              |                     | Not Supporting   |
| LA    | 2020         | LA030302_002       | Lake Charles South Beach-Located within subsegment LA030302_00. This unit is added for swimming advisory tracking purposes only and is not a subsegment as defined by LAC 33:IX.1123.A. et seq. No other assessment is made for this bayou. | Impaired - 303(d) Listed                         | PATHOGENS                                                                                    |                    |                              |                     | Not Supporting   |
| LA    | 2020         | LA030801_00        | West Fork Calcasieu River-From confluence with Beckwith Creek and Hickory Branch to mainstem of Calcasieu River                                                                                                                             | Impaired - With Restoration Plan                 | MERCURY   ORGANIC ENRICHMENT/OXYGEN DEPLETION                                                |                    | Not Supporting               | Fully Supporting    | Fully Supporting |

Air Quality Nonattainment Areas

| Pollutant          | Within Nonattainment Status Area? | Nonattainment Status Applicable Standard(s) | Within Maintenance Status Area? | Maintenance Status Applicable Standard(s) |
|--------------------|-----------------------------------|---------------------------------------------|---------------------------------|-------------------------------------------|
| Ozone              | No                                |                                             | Yes                             | 1-Hour Ozone (1979)                       |
| Lead               | No                                |                                             | No                              |                                           |
| Particulate Matter | No                                |                                             | No                              |                                           |
| Carbon Monoxide    | No                                |                                             | No                              |                                           |
| Sulfur Dioxide     | No                                |                                             | No                              |                                           |

Pollutants

Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site

TRI Pollution Prevention Report  
Air Pollutant Report

| TRI Facility ID | Year | Total Air Emissions | Surface Water Discharges | Off-Site Transfers to POTWs (Publicly Owned Treatment Works) | Underground Injections | Releases to Land | Total On-site Releases | Total Off-site Transfers |
|-----------------|------|---------------------|--------------------------|--------------------------------------------------------------|------------------------|------------------|------------------------|--------------------------|
| 70669VSTCHOLDSP | 2020 | 434,632             | 1,852                    | 0                                                            |                        |                  | 436,484                | 11,963                   |
| 70666VSTCHOLDSP | 2019 | 725,694             | 1,896                    | 0                                                            |                        |                  | 727,590                | 25,998                   |
| 70669VSTCHOLDSP | 2018 | 372,356             | 14,080                   | 0                                                            |                        | 0                | 386,436                | 49,614                   |
| 70669VSTCHOLDSP | 2017 | 349,288             | 11,243                   | 0                                                            |                        | 0                | 360,531                | 79,338                   |
| 70666VSTCHOLDSP | 2016 | 399,348             | 6,855                    | 0                                                            |                        | 0                | 406,203                | 44,094                   |
| 70669VSTCHOLDSP | 2015 | 318,000             | 8,112                    | 0                                                            |                        | 0                | 326,112                | 39,334                   |
| 70669VSTCHOLDSP | 2014 | 284,666             | 9,221                    | 0                                                            |                        | 0                | 293,887                | 74,584                   |
| 70669VSTCHOLDSP | 2013 | 273,391             | 10,154                   | 0                                                            |                        | 0                | 283,545                | 44,134                   |
| 70669VSTCHOLDSP | 2012 | 264,887             | 9,955                    | 0                                                            |                        | 0                | 274,842                | 5,011                    |
| 70666VSTCHOLDSP | 2011 | 242,143             | 7,760                    | 0                                                            |                        | 0                | 249,903                | 66,115                   |

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

| Chemical Name | 2020 | 2019 | 2018 | 2017 | 2016 | 2015 | 2014 | 2013 | 2012 | 2011 |
|---------------|------|------|------|------|------|------|------|------|------|------|
|---------------|------|------|------|------|------|------|------|------|------|------|

| Chemical Name                                                                                                      | 2020    | 2019    | 2018    | 2017    | 2016    | 2015    | 2014   | 2013   | 2012   | 2011   |
|--------------------------------------------------------------------------------------------------------------------|---------|---------|---------|---------|---------|---------|--------|--------|--------|--------|
| 1,1,1-Trichloroethane                                                                                              |         |         |         |         |         |         |        |        |        |        |
| 1,1,1,2,2-Tetrachloroethane                                                                                        |         |         |         |         |         |         |        |        |        |        |
| 1,1,2-Trichloroethane                                                                                              |         |         |         |         |         |         |        |        |        |        |
| 1,2,4-Trichlorobenzene                                                                                             |         |         |         |         |         |         |        |        |        |        |
| 1,2,4-Trimethylbenzene                                                                                             | 208     | 830     |         |         |         |         |        |        |        |        |
| 1,2-Dichlorobenzene                                                                                                |         |         |         |         |         |         |        |        |        |        |
| 1,2-Dichloroethane                                                                                                 |         |         |         |         |         |         |        |        |        |        |
| 1,2-Dichloroethylene                                                                                               |         |         |         |         |         |         |        |        |        |        |
| 1,3-Butadiene                                                                                                      | 3,050   | 7,140   | 1,981   | 1,676   | 1,648   | 2,134   | 1,975  | 1,490  | 1,599  | 2,087  |
| 1,3-Dichlorobenzene                                                                                                |         |         |         |         |         |         |        |        |        |        |
| 1,3-Dichloropropylene                                                                                              |         |         |         |         |         |         |        |        |        |        |
| 1,4-Dichlorobenzene                                                                                                |         |         |         |         |         |         |        |        |        |        |
| Acetaldehyde                                                                                                       | 5,837   | 7,521   | 5,305   | 4,920   | 5,105   | 5,439   | 5,079  | 5,395  |        |        |
| Acetone                                                                                                            |         |         |         |         |         |         |        |        |        |        |
| Acrylic acid                                                                                                       |         |         |         |         |         |         |        |        |        |        |
| Aluminium (fume or dust)                                                                                           | 1,305   | 1,501   | 1,301   | 1,305   | 1,143   | 1,138   | 1,138  | 1,138  | 1,138  | 2,457  |
| Aluminium oxide (fibrous forms)                                                                                    |         |         |         |         |         |         |        |        |        |        |
| Ammonia                                                                                                            | 14,333  | 45,951  | 6,397   |         |         | 7,652   | 12,462 | 9,308  | 7,498  |        |
| Benzene                                                                                                            | 16,837  | 31,229  | 20,954  | 13,558  | 17,676  | 14,907  | 18,175 | 15,422 | 13,396 | 21,005 |
| Benzo[ghi]perylene                                                                                                 | 0       | 0       | 0       | 0       | 0       | 0       | 0      | 0      | 0      | 0      |
| Bis(2-chloroethyl) ether                                                                                           |         |         |         |         |         |         |        |        |        |        |
| Carbon tetrachloride                                                                                               |         |         |         |         |         |         |        |        |        |        |
| Certain glycol ethers                                                                                              | 1,313   | 1,492   | 1,604   | 1,718   | 911     | 930     | 1,010  | 1,035  | 1,637  | 985    |
| Chlorine                                                                                                           | 21,976  | 17,419  | 17,456  | 18,557  | 18,548  | 2,063   | 1,680  | 1,685  | 1,575  | 1,362  |
| Chlorobenzene                                                                                                      |         |         |         |         |         |         |        |        |        |        |
| Chlorodifluoromethane (HCFC-22)                                                                                    |         |         |         |         |         |         |        |        |        |        |
| Chloroethane                                                                                                       | 23      | 36      |         |         |         |         |        |        |        |        |
| Chloroform                                                                                                         |         |         |         |         |         |         |        |        |        |        |
| Chloromethane                                                                                                      |         |         |         |         |         |         |        |        |        |        |
| Chloroprene                                                                                                        |         |         |         |         |         |         |        |        |        |        |
| Chromium                                                                                                           |         |         |         |         |         |         |        |        |        |        |
| Chromium compounds (except for chromite ore mined in the Transvaal Region)                                         | 652     | 201     | 152     | 224     | 1,162   | 359     | 168    | 479    | 177    | 59     |
| Copper compounds                                                                                                   | 335     | 421     | 322     | 562     | 530     | 352     | 482    | 489    | 505    | 192    |
| Dichlorobromomethane                                                                                               |         |         |         |         |         |         |        |        |        |        |
| Dichlorodifluoromethane (CFC-12)                                                                                   |         |         |         |         |         |         |        |        |        |        |
| Dichloromethane                                                                                                    |         |         |         |         |         |         |        |        |        |        |
| Dicyclopentadiene                                                                                                  | 9       | 271     | 307     | 207     | 188     | 216     | 175    | 155    | 263    | 230    |
| Dioxin and dioxin-like compounds (in grams)                                                                        | 11      | 9       | 10      | 8       | 11      | 6       | 6      | 5      | 5      | 4      |
| Ethylbenzene                                                                                                       | 1,261   | 4,753   | 1,118   | 1,312   | 1,952   | 1,136   | 1,398  | 2,408  | 2,058  | 2,699  |
| Ethylene                                                                                                           | 108,456 | 379,638 | 109,957 | 107,368 | 110,592 | 108,205 | 99,216 | 83,923 | 74,040 | 72,099 |
| Ethylene glycol                                                                                                    | 951     | 1,245   | 13,436  | 8,813   | 3,592   | 4,952   | 4,138  | 5,589  | 2,478  | 6,109  |
| Ethylene oxide                                                                                                     | 4,736   | 3,218   | 2,244   | 2,134   | 1,508   | 3,162   | 2,298  | 5,999  | 6,309  | 5,875  |
| Formaldehyde                                                                                                       |         |         |         |         |         |         |        |        |        |        |
| Formic acid                                                                                                        | 5,667   | 11,065  | 7,681   | 7,515   | 16,877  | 9,107   | 5,993  | 6,928  | 5,332  | 7,144  |
| Hexachloroethane                                                                                                   |         |         |         |         |         |         |        |        |        |        |
| Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size) |         |         |         |         |         |         |        |        |        |        |
| Hydrogen fluoride                                                                                                  | 469     | 606     | 529     | 559     | 632     | 555     | 605    | 551    | 1,251  | 1,110  |
| Hydrogen sulfide                                                                                                   | 971     | 1,102   | 1,453   | 1,269   | 57      | 109     | 55     | 501    | 426    |        |
| Lead compounds                                                                                                     | 43      | 1,878   | 384     | 71      | 223     | 262     | 444    | 1,113  | 83     | 46     |
| Mercury compounds                                                                                                  | 3       | 4       | 3       | 3       | 3       | 3       | 2      | 5      | 3      | 1,715  |
| Methanol                                                                                                           | 10,390  | 12,025  | 11,335  | 10,362  | 10,805  | 14,078  | 8,630  | 8,658  | 9,310  | 9,728  |
| Methyl ethyl ketone                                                                                                |         |         |         |         |         |         |        |        |        |        |
| Methyl isobutyl ketone                                                                                             |         |         |         |         |         |         |        |        |        |        |
| Molybdenum trioxide                                                                                                |         |         | 38,195  | 39,145  |         | 12,832  | 30,326 |        |        | 31,296 |
| Naphthalene                                                                                                        | 674     | 3,391   | 980     | 586     | 2,834   | 558     | 1,268  | 531    | 448    | 1,331  |
| Nickel compounds                                                                                                   |         |         |         | 31,115  |         | 10,713  | 24,378 | 35,794 | 708    | 20,125 |
| Nitric acid                                                                                                        | 1,858   | 1,963   | 3,180   | 1,836   | 1,654   | 1,686   | 1,783  | 1,439  | 1,436  | 1,407  |

| Chemical Name                                                                                                  | 2020   | 2019   | 2018   | 2017   | 2016   | 2015   | 2014   | 2013   | 2012   | 2011   |
|----------------------------------------------------------------------------------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Phosphoric acid                                                                                                |        |        |        |        |        |        |        |        |        |        |
| Polycyclic aromatic compounds                                                                                  | 117    | 92     | 68     | 66     | 66     | 66     | 125    | 129    | 105    | 70     |
| Propylene                                                                                                      | 85,853 | 83,081 | 63,373 | 63,471 | 97,921 | 23,230 | 20,890 | 15,967 | 19,672 | 15,659 |
| Silver                                                                                                         |        | 1      |        |        |        |        |        |        |        |        |
| Sodium hydroxide (solution)                                                                                    |        |        |        |        |        |        |        |        |        |        |
| Styrene                                                                                                        | 1,754  | 2,977  | 2,459  | 1,261  | 2,987  | 1,092  | 2,099  | 727    | 878    | 3,244  |
| Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size) |        |        |        |        |        |        |        |        |        |        |
| Tetrachloroethylene                                                                                            |        |        |        |        |        |        |        |        |        |        |
| Toluene                                                                                                        | 3,803  | 10,783 | 7,408  | 6,017  | 9,021  | 10,712 | 11,414 | 12,781 | 9,085  | 10,711 |
| Trichloroethylene                                                                                              |        |        |        |        |        |        |        |        |        |        |
| Vinyl chloride                                                                                                 |        |        |        |        |        |        |        |        |        |        |
| Xylene (mixed isomers)                                                                                         | 3,191  | 7,461  | 3,123  | 3,895  | 5,960  | 5,158  | 6,768  | 6,830  | 5,855  | 6,478  |
| Zinc compounds                                                                                                 | 1,879  | 2,873  | 2,239  | 1,875  | 2,669  | 2,474  | 3,975  | 4,441  | 6,552  | 3,552  |
| n-Butyl alcohol                                                                                                | 81,862 | 54,772 | 54,364 | 50,698 | 75,856 | 59,257 | 46,714 | 45,106 | 65,218 | 47,837 |
| n-Hexane                                                                                                       | 66,621 | 56,838 | 56,731 | 57,764 | 58,166 | 60,882 | 53,603 | 51,659 | 40,814 | 39,402 |

## Community

### EJSCREEN EJ Indexes

Eleven environmental justice (EJ) indexes of EJSCREEN, EPA's screening tool for EJ concerns. EPA uses these indexes to identify geographic areas that may warrant further consideration or analysis for potential EJ concerns. The index values below are for the Census block group in which the facility is located. Note that use of these indexes does not designate an area as an "EJ community" or "EJ facility." EJSCREEN provides screening level indicators, not a determination of the existence or absence of EJ concerns. For more information, see the [EJSCREEN home page](#).

| Census Block Group EJ Indexes (percentile)  |      |
|---------------------------------------------|------|
| Particulate Matter (PM 2.5)                 | 54.5 |
| Ozone                                       | 55.5 |
| NATA Diesel PM                              | 53.5 |
| NATA Air Toxics Cancer Risk                 | 44.1 |
| NATA Respiratory Hazard Index (HI)          | 48.7 |
| Traffic Proximity                           | 50.7 |
| Lead Paint Indicator                        | 62.8 |
| National Priority List (NPL) Site Proximity | 43.7 |
| Risk Management Plan (RMP) Site Proximity   | 15.6 |
| Hazardous Waste Proximity                   | 33.4 |
| Wastewater Discharge Proximity              | 6.6  |

| Number of EJ Indexes Above 80th Percentile |
|--------------------------------------------|
| 0                                          |

[View EJSCREEN Report](#)

### Demographic Profile of Surrounding Area (1 Mile)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 U.S. Census and 2014 - 2018 American Community Survey (ACS) 5-year Summary and are accurate to the extent that the facility latitude and longitude listed below are correct. EPA's spatial processing methodology considers the overlap between the selected radii and the census blocks (for U.S. Census demographics) and census block groups (for ACS demographics) in determining the demographics surrounding the facility. For more detail about this methodology, see the [DFR Data Dictionary](#).

| General Statistics (U.S. Census) |            |
|----------------------------------|------------|
| Total Persons                    | 303        |
| Population Density               | 100/sq.mi. |
| Percent People of Color          | 1.6%       |
| Households in Area               | 97         |
| Housing Units in Area            | 123        |

General Statistics (ACS (American Community Survey))

| Age Breakdown (U.S. Census) : Persons (%) |           |
|-------------------------------------------|-----------|
| Children 5 years and younger              | 21 (7%)   |
| Minors 17 years and younger               | 69 (23%)  |
| Adults 18 years and older                 | 233 (77%) |
| Seniors 65 years and older                | 50 (17%)  |

| Race Breakdown (U.S. Census) : Persons (%) |           |
|--------------------------------------------|-----------|
| White                                      | 243 (80%) |



| General Statistics (ACS (American Community Survey)) |     |
|------------------------------------------------------|-----|
| Total Persons                                        | 262 |
| Households on Public Assistance                      | 0   |
| Persons With Low Income                              | 99  |
| Percent With Low Income                              | 38% |

| Geography               |          |
|-------------------------|----------|
| Radius of Selected Area | 1 mi.    |
| Center Latitude         | 30.2588  |
| Center Longitude        | -93.2937 |
| Land Area               | 99%      |
| Water Area              | 1%       |

| Income Breakdown (ACS (American Community Survey)) - Households (%) |             |
|---------------------------------------------------------------------|-------------|
| Less than \$15,000                                                  | 26 (26.8%)  |
| \$15,000 - \$25,000                                                 | 18 (18.56%) |
| \$25,000 - \$50,000                                                 | 2 (2.06%)   |
| \$50,000 - \$75,000                                                 | 11 (11.34%) |
| Greater than \$75,000                                               | 40 (41.24%) |

| Race Breakdown (U.S. Census) - Persons (%) |          |
|--------------------------------------------|----------|
| African-American                           | 56 (18%) |
| Hispanic-Origin                            | 3 (1%)   |
| Asian/Pacific Islander                     | 0 (0%)   |
| American Indian                            | 1 (0%)   |
| Other/Multiracial                          | 2 (1%)   |

| Education Level (Persons 25 & older) (ACS (American Community Survey)) - Persons (%) |             |
|--------------------------------------------------------------------------------------|-------------|
| Less than 9th Grade                                                                  | 32 (15.69%) |
| 9th through 12th Grade                                                               | 41 (20.1%)  |
| High School Diploma                                                                  | 99 (48.53%) |
| Some College/2-year                                                                  | 18 (8.82%)  |
| B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More                             | 16 (7.84%)  |

Message

---

**From:** McDowell, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26229204C87742FCA47BF006F349DAFD-MCDOWELL, J]  
**Sent:** 6/7/2022 9:03:33 PM  
**To:** Carter, Courtney [carter.courtney@epa.gov]  
**Subject:** Here is what we put for Sasol only a little discussion in the Fact Sheet about J2J  
**Attachments:** Sasol - Draft Letter OECA to DOJ.docx; MEMO to OECA - Sasol Chemicals USA Waiver Packet.docx; Fact Sheet Sasol 5-23.docx; EJSscreen Report Sasol Chemicals.pdf; EJSscreen Report Sasol Chemicals 3-mile.pdf; EJSscreen Report Sasol Chemicals 1-mile.pdf; EJ Screen Summary\_Sasol Waiver Pkg (1).docx; 112r penalty summary Sasol VPCE - 4.26.22.doc

## Justin McDowell

Environmental Life Scientist  
U.S. Environmental Protection Agency  
Region 6 (MC: ECDAC)  
1201 Elm Street, Suite 500  
Dallas, Texas 75270-2102

(214) 665-6557 (desk) (214) 665-3177 (fax)  
[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)



**Confidentiality Warning:**

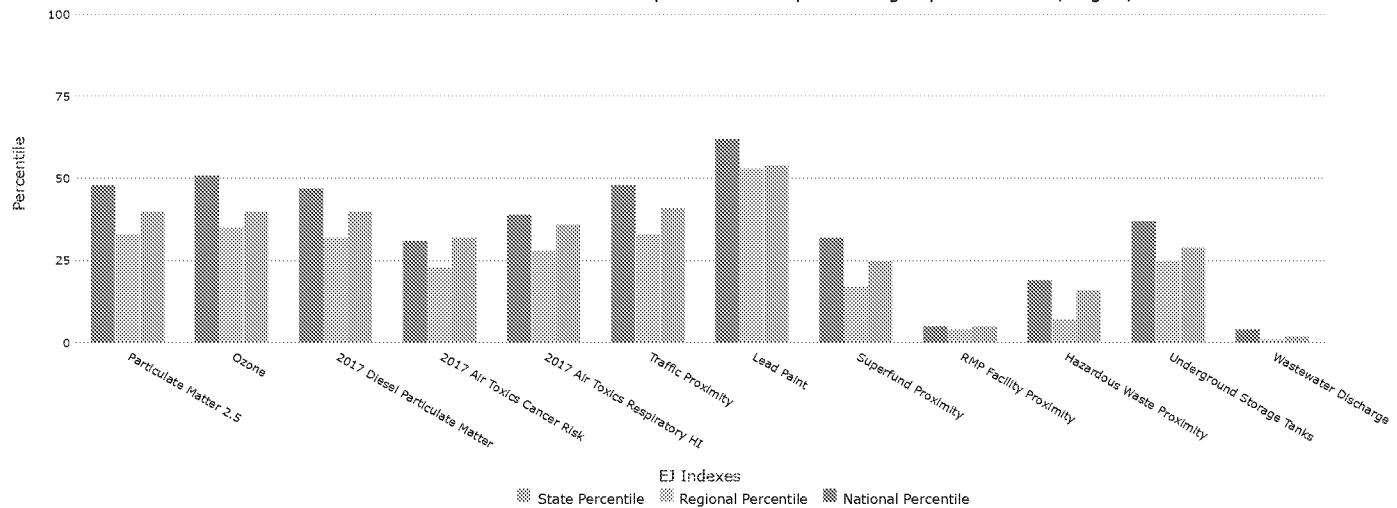
*This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.*

Save as PDF

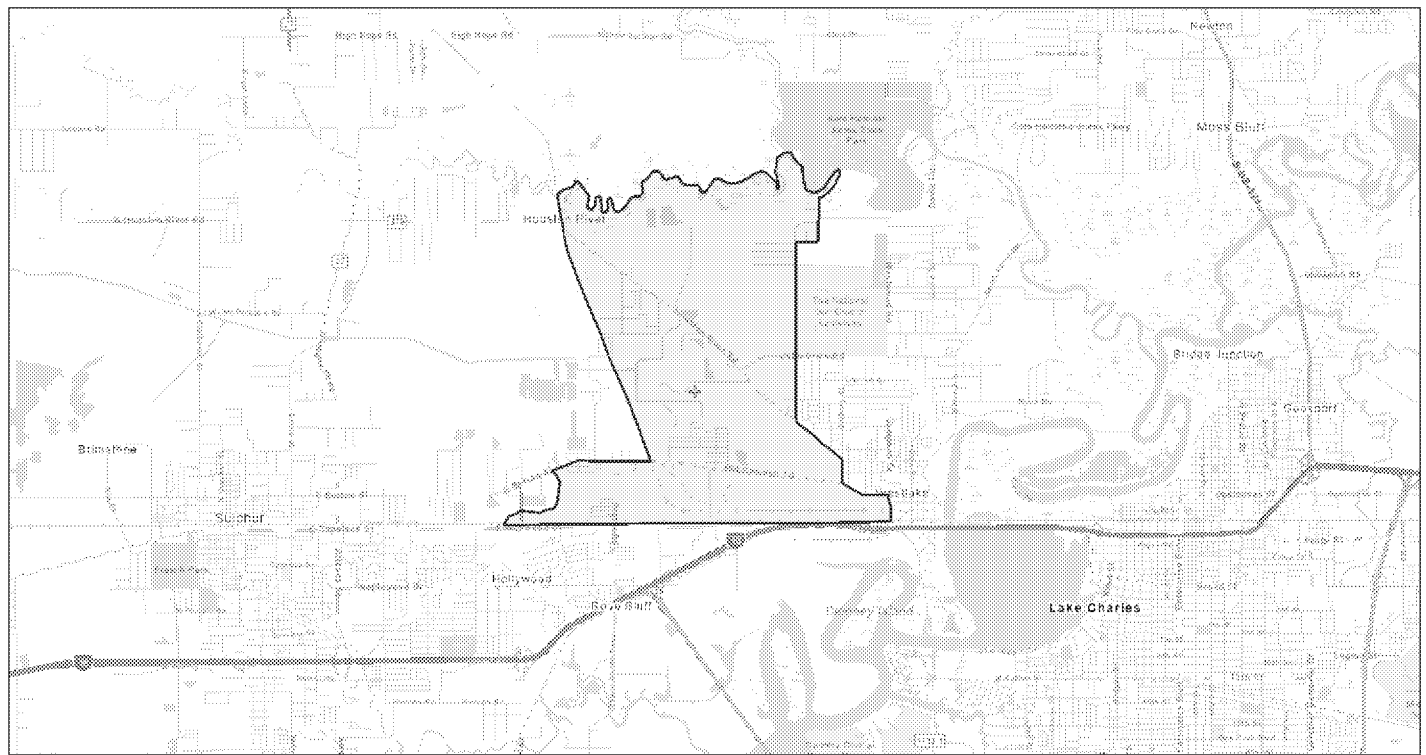
**EJScreen Report (Version 2.0)****Blockgroup: 220190027002****LOUISIANA, EPA Region 6****Approximate Population: 615****Input Area (sq. miles): 9.26**

| Selected Variables                           | Percentile in State | Percentile in EPA Region | Percentile in USA |
|----------------------------------------------|---------------------|--------------------------|-------------------|
| <b>Environmental Justice Indexes</b>         |                     |                          |                   |
| EJ Index for Particulate Matter 2.5          | 40                  | 33                       | 48                |
| EJ Index for Ozone                           | 40                  | 35                       | 51                |
| EJ Index for 2017 Diesel Particulate Matter* | 40                  | 32                       | 47                |
| EJ Index for 2017 Air Toxics Cancer Risk*    | 32                  | 23                       | 31                |
| EJ Index for 2017 Air Toxics Respiratory HI* | 36                  | 28                       | 39                |
| EJ Index for Traffic Proximity               | 41                  | 33                       | 48                |
| EJ Index for Lead Paint                      | 54                  | 53                       | 62                |
| EJ Index for Superfund Proximity             | 25                  | 17                       | 32                |
| EJ Index for RMP Facility Proximity          | 5                   | 4                        | 5                 |
| EJ Index for Hazardous Waste Proximity       | 16                  | 7                        | 19                |
| EJ Index for Underground Storage Tanks       | 29                  | 25                       | 37                |
| EJ Index for Wastewater Discharge            | 2                   | 1                        | 4                 |

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



This report shows the values for environmental and demographic indicators and EJSscreen indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSscreen documentation for discussion of these issues before using reports.

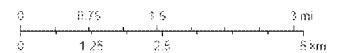


February 24, 2022

Project 3

✦ Search Result (point)

172,224



CONAMEP, Inc., HERE, Garson, DaleOrgh: MITH/ASA, 0730,  
EPA, NPO, LIOQA

| Sites reporting to EPA                                             |   |
|--------------------------------------------------------------------|---|
| Superfund NPL                                                      | 0 |
| Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) | 5 |

| Selected Variables                                                | Value | State |       | EPA Region |          | USA   |          |
|-------------------------------------------------------------------|-------|-------|-------|------------|----------|-------|----------|
|                                                                   |       | Avg.  | %tile | Avg.       | %tile    | Avg.  | %tile    |
| Pollution and Sources                                             |       |       |       |            |          |       |          |
| Particulate Matter 2.5 (µg/m³)                                    | 9.96  | 9.22  | 83    | 9.32       | 75       | 8.74  | 83       |
| Ozone (ppb)                                                       | 36.3  | 37.2  | 36    | 41.1       | 21       | 42.6  | 15       |
| 2017 Diesel Particulate Matter* (µg/m³)                           | 0.185 | 0.298 | 38    | 0.219      | <50th    | 0.295 | <50th    |
| 2017 Air Toxics Cancer Risk* (lifetime risk per million)          | 70    | 41    | 96    | 32         | 95-100th | 29    | 95-100th |
| 2017 Air Toxics Respiratory HI*                                   | 0.6   | 0.45  | 96    | 0.37       | 95-100th | 0.36  | 95-100th |
| Traffic Proximity (daily traffic count/distance to road)          | 33    | 560   | 19    | 470        | 16       | 710   | 17       |
| Lead Paint (% Pre-1960 Housing)                                   | 0     | 0.2   | 9     | 0.16       | 21       | 0.28  | 11       |
| Superfund Proximity (site count/km distance)                      | 0.12  | 0.086 | 82    | 0.08       | 83       | 0.13  | 73       |
| RMP Facility Proximity (facility count/km distance)               | 4.7   | 0.91  | 97    | 0.83       | 98       | 0.75  | 98       |
| Hazardous Waste Proximity (facility count/km distance)            | 2.9   | 1.4   | 84    | 0.8        | 93       | 2.2   | 78       |
| Underground Storage Tanks (count/km²)                             | 0.57  | 2     | 43    | 2          | 38       | 3.9   | 38       |
| Wastewater Discharge (toxicity-weighted concentration/m distance) | 1     | 0.42  | 95    | 0.5        | 97       | 12    | 93       |
| Socioeconomic Indicators                                          |       |       |       |            |          |       |          |
| Demographic Index                                                 | 22%   | 40%   | 26    | 44%        | 18       | 36%   | 34       |
| People of Color                                                   | 7%    | 41%   | 10    | 52%        | 4        | 40%   | 15       |
| Low Income                                                        | 36%   | 39%   | 50    | 36%        | 54       | 31%   | 64       |
| Unemployment Rate                                                 | 0%    | 6%    | 14    | 5%         | 12       | 5%    | 11       |
| Linguistically Isolated                                           | 0%    | 2%    | 62    | 6%         | 37       | 5%    | 45       |
| Less Than High School Education                                   | 25%   | 15%   | 83    | 15%        | 78       | 12%   | 86       |
| Under Age 5                                                       | 3%    | 7%    | 17    | 7%         | 13       | 6%    | 17       |
| Over Age 64                                                       | 20%   | 15%   | 78    | 13%        | 82       | 16%   | 75       |

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>. (<https://www.epa.gov/haps/air-toxics-data-update>)

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice) (<https://www.epa.gov/environmentaljustice>)

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

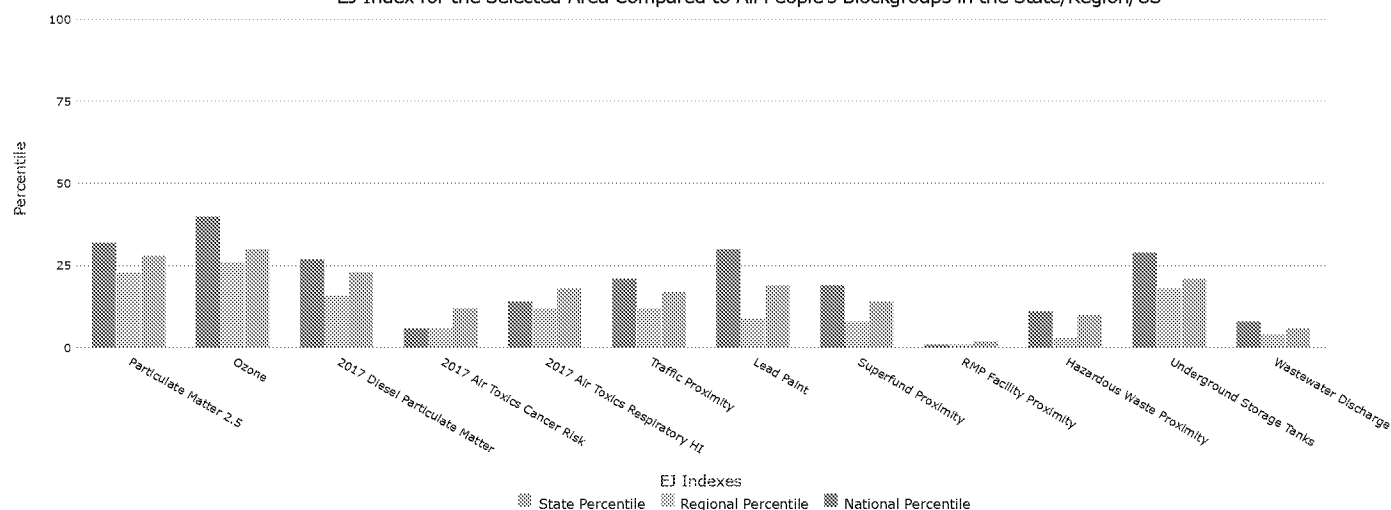
Save as PDF



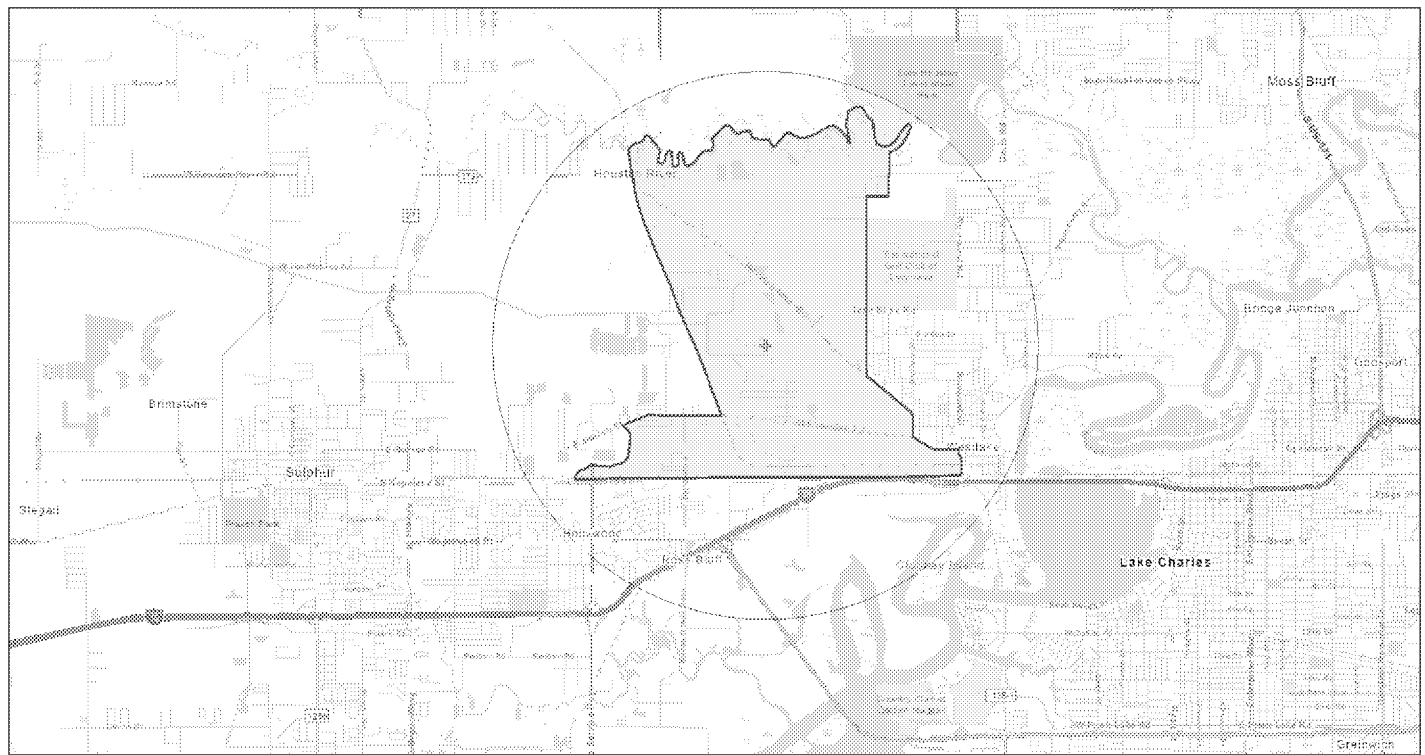
**EJScreen Report (Version 2.0)**  
**3 miles Ring Centered at 30.258771,-93.293667**  
**LOUISIANA, EPA Region 6**  
**Approximate Population: 11,012**  
**Input Area (sq. miles): 28.27**

| Selected Variables                           | Percentile in State | Percentile in EPA Region | Percentile in USA |
|----------------------------------------------|---------------------|--------------------------|-------------------|
| <b>Environmental Justice Indexes</b>         |                     |                          |                   |
| EJ Index for Particulate Matter 2.5          | 28                  | 23                       | 32                |
| EJ Index for Ozone                           | 30                  | 26                       | 40                |
| EJ Index for 2017 Diesel Particulate Matter* | 23                  | 16                       | 27                |
| EJ Index for 2017 Air Toxics Cancer Risk*    | 12                  | 6                        | 6                 |
| EJ Index for 2017 Air Toxics Respiratory HI* | 18                  | 12                       | 14                |
| EJ Index for Traffic Proximity               | 17                  | 12                       | 21                |
| EJ Index for Lead Paint                      | 19                  | 9                        | 30                |
| EJ Index for Superfund Proximity             | 14                  | 8                        | 19                |
| EJ Index for RMP Facility Proximity          | 2                   | 1                        | 1                 |
| EJ Index for Hazardous Waste Proximity       | 10                  | 3                        | 11                |
| EJ Index for Underground Storage Tanks       | 21                  | 18                       | 29                |
| EJ Index for Wastewater Discharge            | 6                   | 4                        | 8                 |

**EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US**



This report shows the values for environmental and demographic indicators and EJScreen indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports.



February 24, 2022

Search Result (point)

Project 1

172,224

0 0.75 1.5 3 mi  
0 1.25 2.5 5 km

CONAN? Esri, HERE, DeLorme, Mapbox, Microsoft, OpenStreetMap, Swatch, EPA, NOAA, USGS, NOAA

#### Sites reporting to EPA

|                                                                    |   |
|--------------------------------------------------------------------|---|
| Superfund NPL                                                      | 0 |
| Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) | 9 |

| Selected Variables                                                | Value | State |       | EPA Region |          | USA   |          |
|-------------------------------------------------------------------|-------|-------|-------|------------|----------|-------|----------|
|                                                                   |       | Avg.  | %tile | Avg.       | %tile    | Avg.  | %tile    |
| Pollution and Sources                                             |       |       |       |            |          |       |          |
| Particulate Matter 2.5 (µg/m³)                                    | 9.9   | 9.22  | 82    | 9.32       | 71       | 8.74  | 82       |
| Ozone (ppb)                                                       | 36.3  | 37.2  | 37    | 41.1       | 21       | 42.6  | 15       |
| 2017 Diesel Particulate Matter* (µg/m³)                           | 0.336 | 0.298 | 65    | 0.219      | 80-90th  | 0.295 | 60-70th  |
| 2017 Air Toxics Cancer Risk* (lifetime risk per million)          | 130   | 41    | 99    | 32         | 95-100th | 29    | 95-100th |
| 2017 Air Toxics Respiratory HI*                                   | 0.82  | 0.45  | 99    | 0.37       | 95-100th | 0.36  | 95-100th |
| Traffic Proximity (daily traffic count/distance to road)          | 300   | 560   | 60    | 470        | 63       | 710   | 57       |
| Lead Paint (% Pre-1960 Housing)                                   | 0.25  | 0.2   | 73    | 0.16       | 77       | 0.28  | 58       |
| Superfund Proximity (site count/km distance)                      | 0.18  | 0.086 | 89    | 0.08       | 91       | 0.13  | 83       |
| RMP Facility Proximity (facility count/km distance)               | 4.5   | 0.91  | 97    | 0.83       | 98       | 0.75  | 98       |
| Hazardous Waste Proximity (facility count/km distance)            | 3.1   | 1.4   | 86    | 0.8        | 95       | 2.2   | 80       |
| Underground Storage Tanks (count/km²)                             | 2     | 2     | 69    | 2          | 65       | 3.9   | 59       |
| Wastewater Discharge (toxicity-weighted concentration/m distance) | 0.82  | 0.42  | 95    | 0.5        | 97       | 1.2   | 92       |
| Socioeconomic Indicators                                          |       |       |       |            |          |       |          |
| Demographic Index                                                 | 24%   | 40%   | 31    | 44%        | 22       | 36%   | 39       |
| People of Color                                                   | 17%   | 41%   | 27    | 52%        | 13       | 40%   | 31       |
| Low Income                                                        | 32%   | 39%   | 42    | 36%        | 47       | 31%   | 57       |
| Unemployment Rate                                                 | 3%    | 6%    | 37    | 5%         | 41       | 5%    | 41       |
| Linguistically Isolated                                           | 0%    | 2%    | 64    | 6%         | 37       | 5%    | 46       |
| Less Than High School Education                                   | 14%   | 15%   | 52    | 15%        | 54       | 12%   | 66       |
| Under Age 5                                                       | 8%    | 7%    | 66    | 7%         | 62       | 6%    | 71       |
| Over Age 64                                                       | 15%   | 15%   | 53    | 13%        | 63       | 16%   | 52       |

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>. (<https://www.epa.gov/haps/air-toxics-data-update>)

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice) (<https://www.epa.gov/environmentaljustice>)

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.



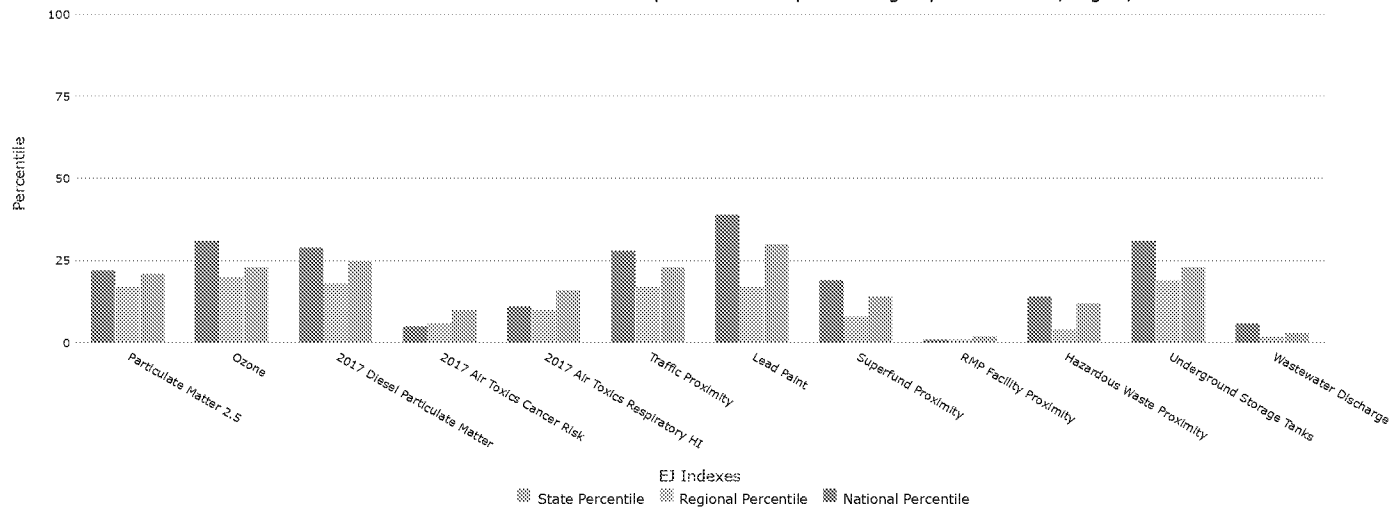
Save as PDF



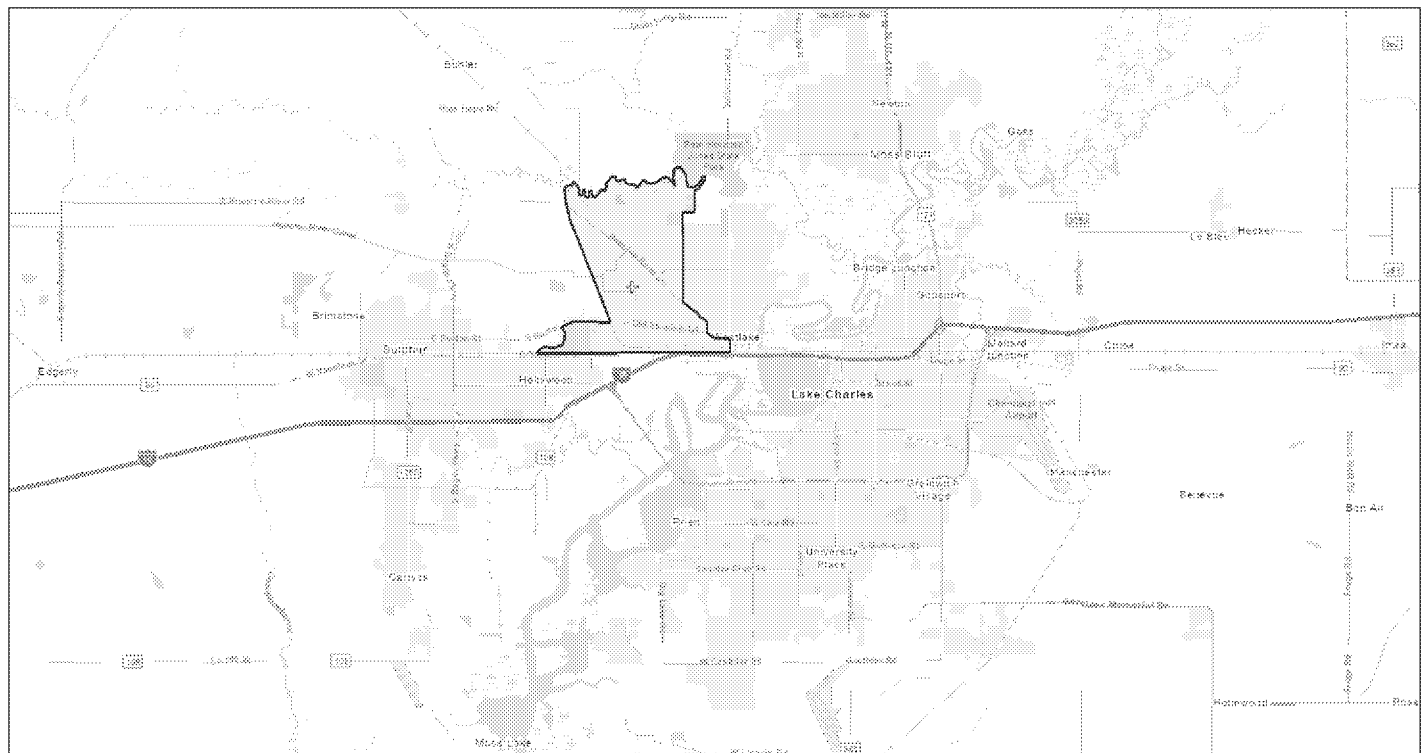
**EJScreen Report (Version 2.0)**  
**1 mile Ring Centered at 30.258771,-93.293839**  
**LOUISIANA, EPA Region 6**  
**Approximate Population: 144**  
**Input Area (sq. miles): 3.14**

| Selected Variables                           | Percentile in State | Percentile in EPA Region | Percentile in USA |
|----------------------------------------------|---------------------|--------------------------|-------------------|
| <b>Environmental Justice Indexes</b>         |                     |                          |                   |
| EJ Index for Particulate Matter 2.5          | 21                  | 17                       | 22                |
| EJ Index for Ozone                           | 23                  | 20                       | 31                |
| EJ Index for 2017 Diesel Particulate Matter* | 25                  | 18                       | 29                |
| EJ Index for 2017 Air Toxics Cancer Risk*    | 10                  | 6                        | 5                 |
| EJ Index for 2017 Air Toxics Respiratory HI* | 16                  | 10                       | 11                |
| EJ Index for Traffic Proximity               | 23                  | 17                       | 28                |
| EJ Index for Lead Paint                      | 30                  | 17                       | 39                |
| EJ Index for Superfund Proximity             | 14                  | 8                        | 19                |
| EJ Index for RMP Facility Proximity          | 2                   | 1                        | 1                 |
| EJ Index for Hazardous Waste Proximity       | 12                  | 4                        | 14                |
| EJ Index for Underground Storage Tanks       | 23                  | 19                       | 31                |
| EJ Index for Wastewater Discharge            | 3                   | 2                        | 6                 |

**EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US**



This report shows the values for environmental and demographic indicators and EJScreen indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports.



February 24, 2022

Search Result (point)

Project 1

1:144,448

0 1.5 3 6 mi  
0 2.5 5 10 km

CONAN? Eps, HERE, Google, Bing/Map, HERE/ASA, GFSR,  
EPA, NPS, USGS

#### Sites reporting to EPA

|                                                                    |   |
|--------------------------------------------------------------------|---|
| Superfund NPL                                                      | 0 |
| Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) | 3 |

| Selected Variables                                                | Value | State |       | EPA Region |          | USA   |          |
|-------------------------------------------------------------------|-------|-------|-------|------------|----------|-------|----------|
|                                                                   |       | Avg.  | %tile | Avg.       | %tile    | Avg.  | %tile    |
| Pollution and Sources                                             |       |       |       |            |          |       |          |
| Particulate Matter 2.5 (µg/m³)                                    | 9.96  | 9.22  | 83    | 9.32       | 75       | 8.74  | 83       |
| Ozone (ppb)                                                       | 36.3  | 37.2  | 36    | 41.1       | 21       | 42.6  | 15       |
| 2017 Diesel Particulate Matter* (µg/m³)                           | 0.185 | 0.298 | 38    | 0.219      | <50th    | 0.295 | <50th    |
| 2017 Air Toxics Cancer Risk* (lifetime risk per million)          | 70    | 41    | 96    | 32         | 95-100th | 29    | 95-100th |
| 2017 Air Toxics Respiratory HI*                                   | 0.6   | 0.45  | 96    | 0.37       | 95-100th | 0.36  | 95-100th |
| Traffic Proximity (daily traffic count/distance to road)          | 82    | 560   | 32    | 470        | 31       | 710   | 30       |
| Lead Paint (% Pre-1960 Housing)                                   | 0.026 | 0.2   | 18    | 0.16       | 35       | 0.28  | 21       |
| Superfund Proximity (site count/km distance)                      | 0.11  | 0.086 | 77    | 0.08       | 80       | 0.13  | 68       |
| RMP Facility Proximity (facility count/km distance)               | 3.6   | 0.91  | 95    | 0.83       | 96       | 0.75  | 97       |
| Hazardous Waste Proximity (facility count/km distance)            | 2.1   | 1.4   | 75    | 0.8        | 89       | 2.2   | 71       |
| Underground Storage Tanks (count/km²)                             | 0.49  | 2     | 42    | 2          | 35       | 3.9   | 36       |
| Wastewater Discharge (toxicity-weighted concentration/m distance) | 0.58  | 0.42  | 94    | 0.5        | 96       | 1.2   | 91       |
| Socioeconomic Indicators                                          |       |       |       |            |          |       |          |
| Demographic Index                                                 | 20%   | 40%   | 20    | 44%        | 14       | 36%   | 30       |
| People of Color                                                   | 11%   | 41%   | 18    | 52%        | 7        | 40%   | 22       |
| Low Income                                                        | 28%   | 39%   | 35    | 36%        | 41       | 31%   | 51       |
| Unemployment Rate                                                 | 1%    | 6%    | 19    | 5%         | 18       | 5%    | 17       |
| Linguistically Isolated                                           | 0%    | 2%    | 62    | 6%         | 37       | 5%    | 45       |
| Less Than High School Education                                   | 28%   | 15%   | 87    | 15%        | 82       | 12%   | 89       |
| Under Age 5                                                       | 4%    | 7%    | 34    | 7%         | 29       | 6%    | 36       |
| Over Age 64                                                       | 18%   | 15%   | 69    | 13%        | 75       | 16%   | 66       |

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>. (<https://www.epa.gov/haps/air-toxics-data-update>)

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice) (<https://www.epa.gov/environmentaljustice>)

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

EJ Screen Summary for Sasol Chemicals USA LLC  
Westlake, LA  
Completed 02/25/2022

#### Methodology

Initial screening uses census "Block Group" scores, for the immediate surrounding area adjacent to the facility. Enhanced screening is conducted for a 1-mile or 3-mile radius if there is a large block group, or a location within the block group is on the edge of that block group. The threshold for determining a "Potential EJ Concern Found" is when at least one of the 11 indices meets or exceeds the 80th percentile for the state, EPA region or nationally. EJ concerns are likely to be present when one or more indices exceed the 90-95 percentile range.

#### Findings

The facility does not meet the criteria for "Potential EJ Concern Found". R6 used the census Block Group for the initial determination. No EJ indices exceeded 80% percentile. The facility is not near the edge of the block group, but to confirm there is no proximity to adjacent block groups with known EJ areas, additional screens were performed for 1-mile and 3-mile radii. The total EJ scores obtained for all indices at the 1-mile and 3-mile radii were < 55 percentile at the state, regional or national levels. The facility is located northwest of Westlake, LA, along the EPA Administrator's FY2022 Journey-to-Justice community tour pathway.

#### Individual Site Characteristics

Sasol Chemicals USA LLC  
2201 OLD SPANISH TRAIL  
WESTLAKE, LA 70669  
FRS 110017418061 / LA0000002201900003  
Lat. 30.2588 Long. -93.2937

EJ Screen Results: Block group - No for EJ - Does not meet threshold.  
Also looked at 1-mile and 3-mile radii - no indices exceeded 80<sup>th</sup> percentile at the state, regional or national level.

**From:** Cole, Howard [Cole.Howard@epa.gov]  
**Sent:** 11/18/2021 6:22:03 AM  
**To:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**CC:** McDowell, Justin [McDowell.Justin@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued." This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

- (a) The owner or operator shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.
- (b) The procedures shall assure that the following considerations are addressed prior to any change:
- (1) The technical basis for the proposed change;
  - (2) Impact of change on safety and health;
  - (3) Modifications to operating procedures;
  - (4) Necessary time period for the change; and,
  - (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>

**Sent:** Wednesday, November 17, 2021 2:24 PM

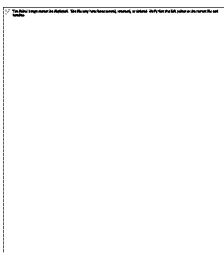
**To:** McDowell, Justin <McDowell.Justin@epa.gov>; Cole, Howard <Cole.Howard@epa.gov>

**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I’ve never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary “repair” does not mean a temporary “change” to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn’t need to be issued. I’m finding guidance from online sources that are not industry codes/standards, but I think I’m going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn’t give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**

Environmental Scientist III

Office of Environmental Compliance

Chemical Accident Prevention Program

602 N. Fifth St., Baton Rouge, LA 70802

(225) 219-3627

Message

---

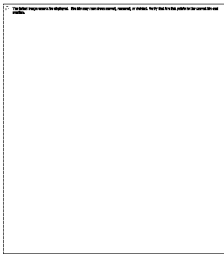
**From:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**Sent:** 11/19/2021 4:19:04 PM  
**To:** Cole, Howard [Cole.Howard@epa.gov]  
**CC:** McDowell, Justin [McDowell.Justin@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process  
**Attachments:** ATT00001.txt

Good morning Howard,

Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <Cole.Howard@epa.gov>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued. "This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

(a) The owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.

(b) The procedures shall assure that the following considerations are addressed prior to any change:

- (1) The technical basis for the proposed change;
- (2) Impact of change on safety and health;
- (3) Modifications to operating procedures;
- (4) Necessary time period for the change; and,
- (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>

**Sent:** Wednesday, November 17, 2021 2:24 PM

**To:** McDowell, Justin <McDowell.Justin@epa.gov>; Cole, Howard <Cole.Howard@epa.gov>

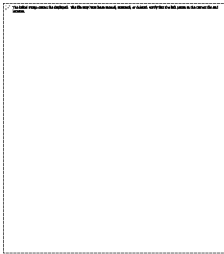
**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process



Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I've never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary "repair" does not mean a temporary "change" to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn't need to be issued. I'm finding guidance from online sources that are not industry codes/standards, but I think I'm going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**

Environmental Scientist III

Office of Environmental Compliance

Chemical Accident Prevention Program

602 N. Fifth St., Baton Rouge, LA 70802

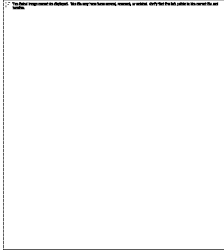
(225) 219-3627

Message

---

**From:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**Sent:** 11/22/2021 1:04:27 PM  
**To:** McDowell, Justin [McDowell.Justin@epa.gov]; Cole, Howard [Cole.Howard@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process  
**Attachments:** ATT00001.txt

If Howard is available, I most definitely would like to have a conference call with the facility this week. I think either Tuesday or Wednesday would be best.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Sent:** Friday, November 19, 2021 3:58 PM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>; Cole, Howard <Cole.Howard@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

I am in agreement with Howard!

Are you having a conference call with the facility next week?

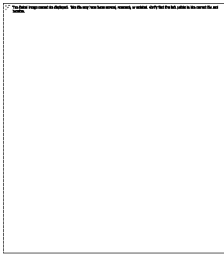
---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Friday, November 19, 2021 10:19 AM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good morning Howard,  
Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>  
**Cc:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued. "This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

(a) The owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.

(b) The procedures shall assure that the following considerations are addressed prior to any change:

- (1) The technical basis for the proposed change;
- (2) Impact of change on safety and health;
- (3) Modifications to operating procedures;
- (4) Necessary time period for the change; and,
- (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>

**Sent:** Wednesday, November 17, 2021 2:24 PM

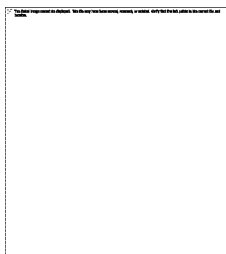
**To:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>; Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>

**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I've never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary "repair" does not mean a temporary "change" to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn't need to be issued. I'm finding guidance from online sources that are not industry codes/standards, but I think I'm going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**

Environmental Scientist III

Office of Environmental Compliance

Chemical Accident Prevention Program

602 N. Fifth St., Baton Rouge, LA 70802

(225) 219-3627

Message

---

**From:** Cole, Howard [Cole.Howard@epa.gov]  
**Sent:** 11/22/2021 4:16:43 PM  
**To:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**CC:** McDowell, Justin [McDowell.Justin@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Hey Bryn:

Tuesday morning is best, afternoon is next best. Wednesday morning is my least favorite, but doable....and Wednesday afternoon is completely out of the question.

In preparation for this call, it would be nice if we knew what is the status of the pipe....for this pipe (piping circuit) are they in compliance with API 570 (i.e., UT and external inspection 5 year) and did their program identify that this pipe was thinning? Did the pipe actually leak content? Second there should be a design/engineering package for the clamp which should contain the procedure for installation and the calculations. I would like to have that for reference.

Give me a call this morning to discuss their position.

214-693-3109

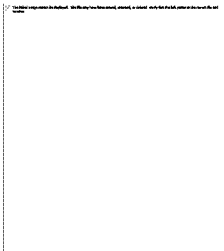
---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Friday, November 19, 2021 10:19 AM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good morning Howard,  
Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <Cole.Howard@epa.gov>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>

Cc: McDowell, Justin <McDowell.Justin@epa.gov>

Subject: RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a pipe wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued." This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them...if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

- (a) The owner or operator shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.
- (b) The procedures shall assure that the following considerations are addressed prior to any change:
- (1) The technical basis for the proposed change;
  - (2) Impact of change on safety and health;
  - (3) Modifications to operating procedures;
  - (4) Necessary time period for the change; and,
  - (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>

**Sent:** Wednesday, November 17, 2021 2:24 PM

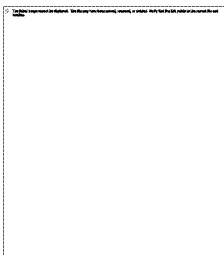
**To:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>; Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>

**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I’ve never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary “repair” does not mean a temporary “change” to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn’t need to be issued. I’m finding guidance from online sources that are not industry codes/standards, but I think I’m going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn’t give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627



Message

---

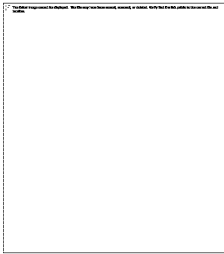
**From:** Cole, Howard [Cole.Howard@epa.gov]  
**Sent:** 11/23/2021 3:09:38 AM  
**To:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**CC:** McDowell, Justin [McDowell.Justin@epa.gov]  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Okay....also send an invite to Justin

---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Monday, November 22, 2021 1:59 PM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Howard,  
It looks like 1:00 p.m. is the time they are able to do. I'll be sending the GoToMeeting link to you shortly.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Bryn LeBlanc  
**Sent:** Monday, November 22, 2021 12:45 PM  
**To:** 'Cole, Howard' <Cole.Howard@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Hey Howard,  
I didn't have an attachment on this email. It may have been the photo from my signature line that was popping up on your end as an attachment. It does that at times and it is annoying.

Here are my notes on the leak clamp and the carbon fiber wrap –

Leak Clamp: 1 ½" pipe in Class 2 service in a covered process area. An API 570 external inspection was conducted on 12/13/2017, which identified a leak clamp found on the line. A work order was generated on 12/14/2017 to have the piping replaced. The work order remains open to this day. A shutdown occurred in 2019, which gave them an opportunity to replace it, but they did not. The previous API 570 external inspection was conducted on 12/26/2012, and this report did not reference the clamp. The facility engineers tried to find record of the clamp being applied, but they could not locate anything. UPipe data shows a remaining life of 5.5 years. I cited them under 40 CFR 68.75(a) for failing to implement written procedures to manage changes to the process equipment, including necessary time period for the change. I also cited them under 40 CFR 68.65(d)(2) for failing to maintain a record of when the temporary clamp was installed, as is required under API 570 6.0 Records section.

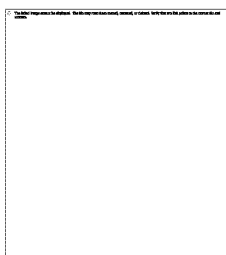
Carbon Fiber wrap: 3" pipe in Class 1 service in a covered process area. An API 570 external inspection was conducted on 3/15/2017 and the inspector removed a section of damaged insulation that revealed significant corrosion. UT readings were taken in these corroded areas, which revealed the remaining wall thickness was at 0.108" and the minimum

operating thickness set in their system is 0.110". A work order was issued on 3/15/2017 to replace the piping since it was below operating t-min. The carbon fiber wrap wasn't applied until three (3) years later on 9/18/2020. Their PSM engineer, Jade, told me that this wrap has a lifespan of around 12-18 months and required calculations and specifications from the manufacturer had to be reviewed prior to installation. I had already cited them under 40 CFR 68.73(e) for waiting three years to put a mitigation measure in place on a pipe below its operating t-min. I also cited them under 40 CFR 68.75(a) for the MOC portion.

Their argument is that they do not believe these temporary repairs constitute a change in the process safety information.

I've heard back from a couple people at the facility confirming availability for tomorrow morning; however, I'm still waiting to hear from their corporate EH&S director (the main one who was arguing the MOC). I'll give him a call if I haven't received an email within the hour. It must be the internal disagreement thing you were talking about. The engineers very much seemed on-board with my reasoning for the MOC, but he was not having any of it.

I'm going to suggest 9:00 a.m. for the call time. Let me know if you prefer a different time.



**Bryn LeBlanc**

Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <Cole.Howard@epa.gov>  
**Sent:** Monday, November 22, 2021 12:02 PM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn,

I can't open your attachment...can you resend also.

Whenever I hear corporate making all the noise, I think this is an internal disagreement where the corporate guy must be right (to us) or it ruins his credibility with all the facilities.

He may have told them verbally or in writing that an MOC was not required for a pipe clamp....now he's trying to save face.

---

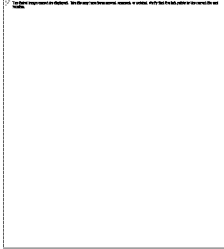
**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Friday, November 19, 2021 10:19 AM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good morning Howard,

Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>  
**Cc:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

“Installed in accordance with code requirements an MOC doesn’t need to be issued. ”This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I’m finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don’t need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

- (a) The owner or operator shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.
- (b) The procedures shall assure that the following considerations are addressed prior to any change:
- (1) The technical basis for the proposed change;
  - (2) Impact of change on safety and health;
  - (3) Modifications to operating procedures;
  - (4) Necessary time period for the change; and,
  - (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>

**Sent:** Wednesday, November 17, 2021 2:24 PM

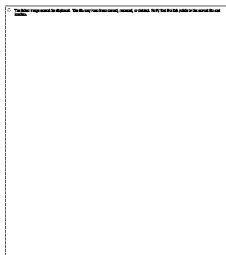
**To:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>; Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>

**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I’ve never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary “repair” does not mean a temporary “change” to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn’t need to be issued. I’m finding guidance from online sources that are not industry codes/standards, but I think I’m going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**

Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

Message

---

**From:** Cole, Howard [Cole.Howard@epa.gov]  
**Sent:** 11/23/2021 8:16:52 PM  
**To:** McDowell, Justin [McDowell.Justin@epa.gov]  
**Subject:** FW: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process  
  
**Flag:** Follow up

I sent the email below to Bryn yesterday:

*Whenever I hear corporate making all the noise, I think this is an internal disagreement where the corporate guy must be right (to us) or it ruins his credibility with all the facilities.*

*He may have told them verbally or in writing that an MOC was not required for a pipe clamp....now he's trying to save face.*

I also told Bryn that being a young woman may have been a factor. Young women in the science and engineering often don't get the respect for knowledge they deserve from men in the industrial, construction, engineering fields, and just good old boys.

---

**From:** Cole, Howard  
**Sent:** Monday, November 22, 2021 12:02 PM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Bryn,

I can't open your attachment...can you resend also.

Whenever I hear corporate making all the noise, I think this is an internal disagreement where the corporate guy must be right (to us) or it ruins his credibility with all the facilities.

He may have told them verbally or in writing that an MOC was not required for a pipe clamp....now he's trying to save face.

---

**From:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Sent:** Friday, November 19, 2021 10:19 AM  
**To:** Cole, Howard <Cole.Howard@epa.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good morning Howard,  
Thank you for your response on this. I think a conference call would be helpful if you're available on Tuesday or Wednesday of next week. The facility's corporate representative wants to discuss this further. I tried to be as clear as possible, but I guess my delivery wasn't as good as I thought it was.

I believe they will be reaching out to me on Monday to get a call scheduled for this next week. Is there any time that works best for you that I can suggest?

Hope you have a good vacation, and I will speak with you next week.



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

---

**From:** Cole, Howard <Cole.Howard@epa.gov>  
**Sent:** Thursday, November 18, 2021 12:22 AM  
**To:** Bryn LeBlanc <Bryn.LeBlanc@la.gov>  
**Cc:** McDowell, Justin <McDowell.Justin@epa.gov>  
**Subject:** RE: Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Bryn:

I am taking vacation Thursday and Friday, be back all next week.

You need to explain to me what a ppie wrap is? Is it different than a pipe clamp? The discussion below addresses pipe clamps.

I don't know what to say...their argument has no merit...completely ridiculous. I have never heard such an argument before.

First, as you say, it is a temporary change to process equipment; and therefore, needs to be managed with a temporary MOC.

Logic:

A pipe is a piece of equipment. It was not installed with a hole or a pipe clamp. So there is a change to the pipe...it was not designed with a clamp or a hole.

The pipe must eventually be permanently repaired or removed...typically removed.

A pipe clamp is an **ENGINEERED PIECE OF EQUIPMENT (I think that is what they do not understand) designed to stop the leak.**

If an employer installs or modifies a piece of equipment (pipe), then the employer must develop and implement a management-of-change (MOC) procedure prior to the installation or modification. New equipment, in this case a pipe clamp, must be fabricated so as to be suitable for the process application for which it will be used.

Maybe use this approach; if they added a valve, tee, pressure gauge, PH meter, relief valve, to a pipe or any other piece of equipment would a MOC would be required? The answer is yes.

"Installed in accordance with code requirements an MOC doesn't need to be issued." This has no bearing on this argument. Irrelevant! Code compliance and MOC are apples and oranges.

Your statement: I'm finding guidance from online sources that are not industry codes/standards...**online sources are fine, there may not be anything that specifically states a pipe clamp requires an MOC.**

You don't need anything concrete to present to this facility. I think the standard is clear. Our position (and the position of the entire regulated community) is that the pipe (a piece of equipment) is being modified by the clamp (a piece of equipment) and hence, a MOC is necessary.

If you want me to do a conference call with you and them....if further validation of your position is necessary...just let me know. However, your position is supported by the standard.

I think they are alone in their position.

§ 68.75 Management of change.

(a) The owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, **equipment**, and procedures; and, changes to stationary sources that affect a covered process.

(b) The procedures shall assure that the following considerations are addressed prior to any change:

- (1) The technical basis for the proposed change;
- (2) Impact of change on safety and health;
- (3) Modifications to operating procedures;
- (4) Necessary time period for the change; and,
- (5) Authorization requirements for the proposed change.

---

**From:** Bryn LeBlanc <[Bryn.LeBlanc@la.gov](mailto:Bryn.LeBlanc@la.gov)>

**Sent:** Wednesday, November 17, 2021 2:24 PM

**To:** McDowell, Justin <[McDowell.Justin@epa.gov](mailto:McDowell.Justin@epa.gov)>; Cole, Howard <[Cole.Howard@epa.gov](mailto:Cole.Howard@epa.gov)>

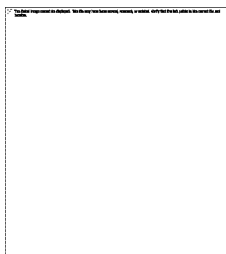
**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I've never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary "repair" does not mean a temporary "change" to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn't need to be issued. I'm finding guidance from online sources that are not industry codes/standards, but I think I'm going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!





**Bryn LeBlanc**

Environmental Scientist III

Office of Environmental Compliance

Chemical Accident Prevention Program

602 N. Fifth St., Baton Rouge, LA 70802

(225) 219-3627

Message

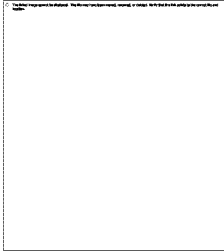
---

**From:** Bryn LeBlanc [Bryn.LeBlanc@la.gov]  
**Sent:** 11/17/2021 8:24:03 PM  
**To:** McDowell, Justin [McDowell.Justin@epa.gov]; Cole, Howard [Cole.Howard@epa.gov]  
**Subject:** Question Regarding Temporary Repairs to Piping being Managed through the MOC Process  
**Attachments:** ATT00001.txt

Good afternoon Justin and Howard,

Our CAPP team is on an inspection at Firestone, and we are getting some push back on temporary repairs (e.g. leak clamps or wraps) on piping as not needing to be managed through the MOC process. I've never gotten push-back on this before, and my reasoning to them is that this was a temporary change to process equipment; therefore, it needed to be managed with a temporary MOC. They are arguing a temporary "repair" does not mean a temporary "change" to equipment according to the regulation, and that since the temporary repair was installed in accordance with code requirements, an MOC doesn't need to be issued. I'm finding guidance from online sources that are not industry codes/standards, but I think I'm going to need something more concrete to present to this facility as to why a temporary repair is considered a temporary change under 40 CFR 68.75(a). It is an OSHA PSM covered facility, so OSHA guidance on MOCs may also help us.

I know we cited Sasol for this very thing with a pipe clamp, but they didn't give push back on the semantics of the regulation. Any help would be appreciated!



**Bryn LeBlanc**  
Environmental Scientist III  
Office of Environmental Compliance  
Chemical Accident Prevention Program  
602 N. Fifth St., Baton Rouge, LA 70802  
(225) 219-3627

EJ Screen Summary for Sasol Chemicals USA LLC  
Westlake, LA  
Completed 02/25/2022

#### Methodology

Initial screening uses census "Block Group" scores, for the immediate surrounding area adjacent to the facility. Enhanced screening is conducted for a 1-mile or 3-mile radius if there is a large block group, or a location within the block group is on the edge of that block group. The threshold for determining a "Potential EJ Concern Found" is when at least one of the 11 indices meets or exceeds the 80th percentile for the state, EPA region or nationally. EJ concerns are likely to be present when one or more indices exceed the 90-95 percentile range.

#### Findings

The facility does not meet the criteria for "Potential EJ Concern Found". R6 used the census Block Group for the initial determination. No EJ indices exceeded 80% percentile. The facility is not near the edge of the block group, but to confirm there is no proximity to adjacent block groups with known EJ areas, additional screens were performed for 1-mile and 3-mile radii. The total EJ scores obtained for all indices at the 1-mile and 3-mile radii were < 55 percentile at the state, regional or national levels. The facility is located northwest of Westlake, LA, along the EPA Administrator's FY2022 Journey-to-Justice community tour pathway.

#### Individual Site Characteristics

Sasol Chemicals USA LLC  
2201 OLD SPANISH TRAIL  
WESTLAKE, LA 70669  
FRS 110017418061 / LA0000002201900003  
Lat. 30.2588 Long. -93.2937

EJ Screen Results: Block group - No for EJ - Does not meet threshold.  
Also looked at 1-mile and 3-mile radii - no indices exceeded 80<sup>th</sup> percentile at the state, regional or national level.